

Exhibit 2

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

UNILOC 2017 LLC.

Plaintiff,

V.

NETFLIX, INC.,

Defendant.

**LEAD CONSOLIDATED CASE:
8:18-cv-02055-GW-DFM**

**THIRD PARTY FORTRESS
INVESTMENT GROUP LLC'S
RESPONSES AND OBJECTIONS
TO NETFLIX, INC.'S
DOCUMENT PRODUCTION AND
DEPOSITION SUBPOENAS**

1 Third party Fortress Investment Group LLC (“FIG”) serves the following
 2 responses and objections to the June 17, 2020 subpoena duces tecum and subpoena
 3 ad testificandum (collectively, “Subpoena”) served by Defendant Netflix, Inc. in the
 4 above-entitled case (“Netflix Litigation”).

5 **GENERAL OBJECTIONS**

6 The following objections apply to Netflix’s Subpoena. To the extent any
 7 specific objection is also made to a particular Request for Production (“Request”)
 8 or Deposition Topic (“Topic”), FIG does not waive or otherwise limit any general
 9 objection.

10 1. FIG objects to the Subpoena on the grounds that the date for
 11 compliance of the documents requests and to provide deposition testimony is
 12 unreasonable, unduly burdensome, and harassing. Given the unduly broad
 13 Requests and Topics, FIG needs sufficient time to properly investigate, analyze,
 14 and respond to the Subpoena.

15 2. FIG objects to the Subpoena to the extent it seeks information
 16 protected by the attorney-client privilege, the attorney work-product immunity
 17 doctrine, the common interest privilege, and any other applicable privilege or
 18 protection, and any inadvertent production shall not be deemed a waiver off any
 19 privilege with respect to the documents or information produced or of any work-
 20 product immunity doctrine that may attach. Accordingly, FIG objects to producing
 21 any documents or testimony protected by, for example, Fed. R. Evid. 501.

22 3. FIG objects to the Subpoena as overly broad, unduly burdensome and
 23 oppressive to the extent that it is indefinite as to time or scope or otherwise not
 24 limited to a time frame relevant to issues in the Netflix Litigation.

25 4. FIG objects to the Subpoena as unduly burdensome to the extent it
 26 seeks information already in Netflix’s possession.

27 5. FIG objects to the Requests and Topics to the extent they purport to
 28 cover material relevant to patents found to be invalid, patents dismissed from the

1 Netflix Litigation, or products not at issue in the Netflix Litigation.

2 6. FIG objects to these Requests and Topics to the extent they purport to
3 cover material relevant to patents other than the patents asserted in the Netflix
4 Litigation.

5 7. FIG objects to the Subpoena, and the Definitions and Instructions
6 thereto, to the extent they seek to impose obligations on FIG that are inconsistent
7 with and/or beyond the scope of those imposed or authorized by the Federal Rules
8 of Civil Procedure, the Local Rules, or the rules or decisions of this Court.

9 8. FIG objects to the Subpoena's Instructions as oppressive, overly broad,
10 unduly burdensome, unreasonable, and in contravention of the Federal Rules of
11 Civil Procedure and other applicable legal authority.

12 9. FIG objects to each individual Request and Topic to the extent it is
13 vague, ambiguous, nonsensical, oppressive, overly broad, unduly burdensome,
14 unreasonably cumulative or duplicative, seeks information that is more
15 conveniently or less expensively obtained from another source including a party in
16 this action (*e.g.*, Uniloc 2017), or seeks information that is not proportional to the
17 needs of the Netflix Litigation.

18 10. FIG objects to each Request and Topic to the extent that it calls for
19 information not within the scope of knowledge of any FIG representative. To do so
20 would place an undue burden on FIG, require more of FIG than any obligation
21 imposed by law, would subject FIG to unreasonable and undue burden and expense,
22 and would seek to impose upon FIG an obligation to investigate or discover
23 information or materials from third parties or sources that are equally accessible to
24 Netflix.

25 11. FIG objects to each Request and Topic to the extent that it seeks
26 information not relevant to the subject matter of this action or to a claim or defense,
27 currently part of the Netflix Litigation, of any party and/or is not proportional to the
28 needs of the Netflix Litigation.

1 12. FIG objects to the Subpoena to the extent it seeks information subject
 2 to a nondisclosure or confidentiality agreement with a third party and/or the trade
 3 secrets, or information confidential and proprietary to, a third party.

4 13. FIG objects to the Requests and Topics to the extent that they require
 5 FIG to provide information that is not kept by FIG in the normal course of business.
 6 FIG objects to the Requests and Topics to the extent they seek documents and
 7 information that are no longer active or readily accessible on FIG databases but
 8 might exist in electronic archives or back-up files. FIG will not rebuild these
 9 electronic archives and back-up files in order to search for documents that may be
 10 responsive to the Requests or Topics.

11 14. FIG objects to the Requests and Topics to the extent that they require
 12 FIG to search for and produce email in contravention of the E-Discovery Order
 13 (“ESI Order”) that was entered July 3, 2019 (Dkt. No. 75). FIG will not search for
 14 email that may purportedly be responsive to the Requests or Topics.

15 15. FIG objects to Netflix’s definition of “You” and “Your” to the extent
 16 that it includes third parties that are legally independent of FIG and on whose
 17 behalf FIG cannot respond. Accordingly, FIG will respond only on behalf of itself.

18 16. FIG objects to Netflix’s definition of “Uniloc” as vague, ambiguous,
 19 nonsensical, oppressive, overly broad and unduly burdensome. Accordingly, to the
 20 extent proper and feasible, FIG will construe “Uniloc” to mean specifically Uniloc
 21 Luxembourg S.à.r.l (f.k.a. Uniloc Luxembourg S.A.).

22 17. FIG objects to Netflix’s definition of “Pendrell” as vague, ambiguous,
 23 nonsensical, oppressive, overly broad and unduly burdensome. Accordingly, to the
 24 extent proper and feasible, FIG will construe “Pendrell” to mean specifically
 25 Pendrell Technologies LLC.

26 18. FIG objects to Netflix’s definition of “LINQware” as vague,
 27 ambiguous, nonsensical, oppressive, overly broad and unduly burdensome.
 28 Accordingly, to the extent proper and feasible, FIG will construe “LINQware” to

mean specifically LINQware, Inc.

19. FIG objects to Netflix's definition of "Communication(s)" and "communicate(s)" to the extent that it seeks to impose obligations different from and/or in addition to the Federal Rules of Civil Procedure or the Local Rules of this Court.

20. FIG objects to Netflix's definition of "Document" and "Documents" to the extent that it seeks to impose obligations different from and/or in addition to the Federal Rules of Civil Procedure or the Local Rules of this Court.

21. FIG objects to Netflix's definition of "Identify," "identifying," and "identification" to the extent that it seeks to impose obligations different from and/or in addition to the Federal Rules of Civil Procedure or the Local Rules of this Court.

22. Each of the above General Objections shall be deemed continuing and is incorporated into the specific responses set forth below, whether or not specifically stated in response to each Request, and is not waived or in any way limited by the responses below. No response to a Request shall be understood as, nor is it intended to be, a waiver of any General Objection or any Specific Objection that may be separately stated with respect to any response. Nor shall any response to a Request be deemed to constitute any agreement or concession that the subject matter thereof is relevant to this action. All of the responses set forth below are made without waiving or intending to waive any objection, including but not limited to objections as to competency, relevancy, materiality, authenticity, privilege, or admissibility.

RESPONSE TO DOCUMENT REQUESTS

REQUEST NO. 1.

All articles of organization for You and Uniloc 2017.

RESPONSE TO REQUEST NO. 1.

In addition to the General Objections, all of which are incorporated by

1 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 2 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 3 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 4 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 5 that are not relevant to any claims or defenses in the Netflix Litigation and is
 6 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 7 to this Request to the extent it seeks information protected by the attorney-client
 8 privilege, the attorney work-product immunity doctrine, the common interest
 9 privilege, and any other applicable privilege or protection. FIG also objects to this
 10 Request to the extent it seeks third-party documents that FIG is obligated to keep
 11 confidential.

12 On all of these grounds, FIG objects to producing, and will not produce, any
 13 documents responsive to this Request.

14 **REQUEST NO. 2.**

15 Documents sufficient to identify persons with a membership interest in You
 16 and/or Uniloc 2017.

17 **RESPONSE TO REQUEST NO. 2.**

18 In addition to the General Objections, all of which are incorporated by
 19 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 20 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 21 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 22 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 23 that are not relevant to any claims or defenses in the Netflix Litigation and is
 24 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 25 to this Request to the extent it seeks information protected by the attorney-client
 26 privilege, the attorney work-product immunity doctrine, the common interest
 27 privilege, and any other applicable privilege or protection. FIG also objects to this
 28 Request to the extent it seeks third-party documents that FIG is obligated to keep

1 confidential.

2 On all of these grounds, FIG objects to producing, and will not produce, any
 3 documents responsive to this Request.

4 **REQUEST NO. 3.**

5 Documents sufficient to identify all of Your and Uniloc 2017's present
 6 members, managers, officers, employees, and agents.

7 **RESPONSE TO REQUEST NO. 3.**

8 In addition to the General Objections, all of which are incorporated by
 9 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 10 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 11 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 12 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 13 that are not relevant to any claims or defenses in the Netflix Litigation and is
 14 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 15 to this Request to the extent it seeks information protected by the attorney-client
 16 privilege, the attorney work-product immunity doctrine, the common interest
 17 privilege, and any other applicable privilege or protection. FIG also objects to this
 18 Request to the extent it seeks third-party documents that FIG is obligated to keep
 19 confidential.

20 On all of these grounds, FIG objects to producing, and will not produce, any
 21 documents responsive to this Request.

22 **REQUEST NO. 4.**

23 All Documents relating to the business relationship between You and Uniloc,
 24 including the date the relationship began and the scope of the relationship.

25 **RESPONSE TO REQUEST NO. 4.**

26 In addition to the General Objections, all of which are incorporated by
 27 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 28 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 non-party to the Netflix Litigation, that Netflix can obtain from other sources,

1 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 2 that are not relevant to any claims or defenses in the Netflix Litigation and is
 3 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 4 to this Request to the extent it seeks information protected by the attorney-client
 5 privilege, the attorney work-product immunity doctrine, the common interest
 6 privilege, and any other applicable privilege or protection. FIG also objects to this
 7 Request to the extent it seeks third-party documents that FIG is obligated to keep
 8 confidential. FIG objects to this Request to the extent it requires FIG to search for
 9 and produce email in contravention of the applicable ESI Order entered in the
 10 Netflix Litigation.

11 On all of these grounds, FIG objects to producing, and will not produce, any
 12 documents responsive to this Request.

13 **REQUEST NO. 5.**

14 All agreements entered into between You and Uniloc.

15 **RESPONSE TO REQUEST NO. 5.**

16 In addition to the General Objections, all of which are incorporated by
 17 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 18 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 19 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 20 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 21 that are not relevant to any claims or defenses in the Netflix Litigation and is
 22 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 23 to this Request to the extent it seeks information protected by the attorney-client
 24 privilege, the attorney work-product immunity doctrine, the common interest
 25 privilege, and any other applicable privilege or protection. FIG also objects to this
 26 Request to the extent it seeks third-party documents that FIG is obligated to keep
 27 confidential.

28 On all of these grounds, FIG objects to producing, and will not produce, any

1 documents responsive to this Request.

2 **REQUEST NO. 6.**

3 All Documents relating to the business relationship between You and Uniloc
4 2017, including the date the relationship began and the scope of the relationship.

5 **RESPONSE TO REQUEST NO. 6.**

6 In addition to the General Objections, all of which are incorporated by
7 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
8 broad and unduly burdensome to the extent that it seeks documents from FIG, a
9 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
10 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
11 that are not relevant to any claims or defenses in the Netflix Litigation and is
12 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
13 to this Request to the extent it seeks information protected by the attorney-client
14 privilege, the attorney work-product immunity doctrine, the common interest
15 privilege, and any other applicable privilege or protection. FIG also objects to this
16 Request to the extent it seeks third-party documents that FIG is obligated to keep
17 confidential. FIG objects to this Request to the extent it requires FIG to search for
18 and produce email in contravention of the applicable ESI Order entered in the
19 Netflix Litigation.

20 On all of these grounds, FIG objects to producing, and will not produce, any
21 documents responsive to this Request.

22 **REQUEST NO. 7.**

23 All agreements entered into between You and Uniloc 2017.

24 **RESPONSE TO REQUEST NO. 7.**

25 In addition to the General Objections, all of which are incorporated by
26 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
27 broad and unduly burdensome to the extent that it seeks documents from FIG, a
28 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
including Uniloc 2017. FIG also objects to this Request in that it seeks documents

1 that are not relevant to any claims or defenses in the Netflix Litigation and is
 2 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 3 to this Request to the extent it seeks information protected by the attorney-client
 4 privilege, the attorney work-product immunity doctrine, the common interest
 5 privilege, and any other applicable privilege or protection. FIG also objects to this
 6 Request to the extent it seeks third-party documents that FIG is obligated to keep
 7 confidential.

8 On all of these grounds, FIG objects to producing, and will not produce, any
 9 documents responsive to this Request.

10 **REQUEST NO. 8.**

11 All Documents relating to the formation, creation, ownership, funding, and
 12 operation of Uniloc 2017.

13 **RESPONSE TO REQUEST NO. 8.**

14 In addition to the General Objections, all of which are incorporated by
 15 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 16 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 17 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 18 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 19 that are not relevant to any claims or defenses in the Netflix Litigation and is
 20 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 21 to this Request to the extent it seeks information protected by the attorney-client
 22 privilege, the attorney work-product immunity doctrine, the common interest
 23 privilege, and any other applicable privilege or protection. FIG also objects to this
 24 Request to the extent it seeks third-party documents that FIG is obligated to keep
 25 confidential. FIG objects to this Request to the extent it requires FIG to search for
 26 and produce email in contravention of the applicable ESI Order entered in the
 27 Netflix Litigation.

28 On all of these grounds, FIG objects to producing, and will not produce, any

1 documents responsive to this Request.

2 **REQUEST NO. 9.**

3 Documents sufficient to show Your revenues, expenses, and profits from
4 patent asserting activities since 2013.

5 **RESPONSE TO REQUEST NO. 9.**

6 In addition to the General Objections, all of which are incorporated by
7 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
8 broad and unduly burdensome to the extent that it seeks documents from FIG, a
9 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks
10 documents that are not relevant to any claims or defenses in the Netflix Litigation
11 and is therefore not proportional to the needs of the Netflix Litigation. FIG further
12 objects to this Request to the extent it seeks information protected by the attorney-
13 client privilege, the attorney work-product immunity doctrine, the common interest
14 privilege, and any other applicable privilege or protection. FIG also objects to this
15 Request to the extent it seeks third-party documents that FIG is obligated to keep
16 confidential.

17 On all of these grounds, FIG objects to producing, and will not produce, any
18 documents responsive to this Request.

19 **REQUEST NO. 10.**

20 All Documents relating to Your policies, practices, and customs concerning
21 patent asserting activities since 2013.

22 **RESPONSE TO REQUEST NO. 10.**

23 In addition to the General Objections, all of which are incorporated by
24 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
25 broad and unduly burdensome to the extent that it seeks documents from FIG, a
26 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks
27 documents that are not relevant to any claims or defenses in the Netflix Litigation
28 and is therefore not proportional to the needs of the Netflix Litigation. FIG further
objects to this Request to the extent it seeks information protected by the attorney-

1 client privilege, the attorney work-product immunity doctrine, the common interest
 2 privilege, and any other applicable privilege or protection. FIG also objects to this
 3 Request to the extent it seeks third-party documents that FIG is obligated to keep
 4 confidential. FIG objects to this Request to the extent it requires FIG to search for
 5 and produce email in contravention of the applicable ESI Order entered in the
 6 Netflix Litigation.

7 On all of these grounds, FIG objects to producing, and will not produce, any
 8 documents responsive to this Request.

9 **REQUEST NO. 11.**

10 All Documents relating to IPG Electronics 502 Limited's acquisition of
 11 patents including the '229 Patent from Electronics and Telecommunications
 Research Institute (ETRI).

12 **RESPONSE TO REQUEST NO. 11.**

13 In addition to the General Objections, all of which are incorporated by
 14 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 15 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 16 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 17 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 18 that are not relevant to any claims or defenses in the Netflix Litigation and is
 19 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 20 to this Request to the extent it seeks information protected by the attorney-client
 21 privilege, the attorney work-product immunity doctrine, the common interest
 22 privilege, and any other applicable privilege or protection. FIG also objects to this
 23 Request to the extent it seeks third-party documents that FIG is obligated to keep
 24 confidential. FIG objects to this Request to the extent it requires FIG to search for
 25 and produce email in contravention of the applicable ESI Order entered in the
 26 Netflix Litigation.

27 On all of these grounds, FIG objects to producing, and will not produce, any
 28 documents responsive to this Request.

REQUEST NO. 12.

All Documents relating to Pendrell's acquisition of patents including the '229 Patent from IPG Electronics 502 Limited.

RESPONSE TO REQUEST NO. 12.

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Request in that it seeks documents that are not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Request to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Request to the extent it seeks third-party documents that FIG is obligated to keep confidential. FIG objects to this Request to the extent it requires FIG to search for and produce email in contravention of the applicable ESI Order entered in the Netflix Litigation.

On all of these grounds, FIG objects to producing, and will not produce, any documents responsive to this Request.

REQUEST NO. 13.

All Documents relating to Uniloc's acquisition of the Pendrell Portfolio patents from Pendrell, including but not limited to all agreements, memoranda, and analyses related to such acquisition.

RESPONSE TO REQUEST NO. 13.

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources,

1 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 2 that are not relevant to any claims or defenses in the Netflix Litigation and is
 3 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 4 to this Request to the extent it seeks information protected by the attorney-client
 5 privilege, the attorney work-product immunity doctrine, the common interest
 6 privilege, and any other applicable privilege or protection. FIG also objects to this
 7 Request to the extent it seeks third-party documents that FIG is obligated to keep
 8 confidential. FIG objects to this Request to the extent it requires FIG to search for
 9 and produce email in contravention of the applicable ESI Order entered in the
 10 Netflix Litigation.

11 On all of these grounds, FIG objects to producing, and will not produce, any
 12 documents responsive to this Request.

13 **REQUEST NO. 14.**

14 All Communications with Uniloc relating to the acquisition of the Pendrell
 15 Portfolio patents.

16 **RESPONSE TO REQUEST NO. 14.**

17 In addition to the General Objections, all of which are incorporated by
 18 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 19 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 20 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 21 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 22 that are not relevant to any claims or defenses in the Netflix Litigation and is
 23 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 24 to this Request to the extent it seeks information protected by the attorney-client
 25 privilege, the attorney work-product immunity doctrine, the common interest
 26 privilege, and any other applicable privilege or protection. FIG also objects to this
 27 Request to the extent it seeks third-party documents that FIG is obligated to keep
 28 confidential. FIG objects to this Request to the extent it requires FIG to search for

1 and produce email in contravention of the applicable ESI Order entered in the
2 Netflix Litigation.

3 On all of these grounds, FIG objects to producing, and will not produce, any
4 documents responsive to this Request.

5 **REQUEST NO. 15.**

6 All Communications with Pendrell relating to the acquisition of the Pendrell
7 Portfolio patents.

8 **RESPONSE TO REQUEST NO. 15.**

9 In addition to the General Objections, all of which are incorporated by
10 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
11 broad and unduly burdensome to the extent that it seeks documents from FIG, a
12 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
13 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
14 that are not relevant to any claims or defenses in the Netflix Litigation and is
15 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
16 to this Request to the extent it seeks information protected by the attorney-client
17 privilege, the attorney work-product immunity doctrine, the common interest
18 privilege, and any other applicable privilege or protection. FIG also objects to this
19 Request to the extent it seeks third-party documents that FIG is obligated to keep
20 confidential. FIG objects to this Request to the extent it requires FIG to search for
21 and produce email in contravention of the applicable ESI Order entered in the
22 Netflix Litigation.

23 On all of these grounds, FIG objects to producing, and will not produce, any
24 documents responsive to this Request.

25 **REQUEST NO. 16.**

26 All agreements and licenses between You and Uniloc concerning any rights
27 to any of the Pendrell Portfolio patents.

28 **RESPONSE TO REQUEST NO. 16.**

29 In addition to the General Objections, all of which are incorporated by

1 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
2 broad and unduly burdensome to the extent that it seeks documents from FIG, a
3 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
4 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
5 that are not relevant to any claims or defenses in the Netflix Litigation and is
6 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
7 to this Request to the extent it seeks information protected by the attorney-client
8 privilege, the attorney work-product immunity doctrine, the common interest
9 privilege, and any other applicable privilege or protection. FIG also objects to this
10 Request to the extent it seeks third-party documents that FIG is obligated to keep
11 confidential.

12 On all of these grounds, FIG objects to producing, and will not produce, any
13 documents responsive to this Request.

14 **REQUEST NO. 17.**

15 All Documents and Communications relating to any valuations of any of the
16 Pendrell Portfolio patents.

17 **RESPONSE TO REQUEST NO. 17.**

18 In addition to the General Objections, all of which are incorporated by
19 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
20 broad and unduly burdensome to the extent that it seeks documents from FIG, a
21 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
22 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
23 that are not relevant to any claims or defenses in the Netflix Litigation and is
24 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
25 to this Request to the extent it seeks information protected by the attorney-client
26 privilege, the attorney work-product immunity doctrine, the common interest
27 privilege, and any other applicable privilege or protection. FIG also objects to this
28 Request to the extent it seeks third-party documents that FIG is obligated to keep

1 confidential. FIG objects to this Request to the extent it requires FIG to search for
 2 and produce email in contravention of the applicable ESI Order entered in the
 3 Netflix Litigation.

4 On all of these grounds, FIG objects to producing, and will not produce, any
 5 documents responsive to this Request.

6 **REQUEST NO. 18.**

7 All Documents relating to Uniloc's acquisition of the LINQware Portfolio
 8 patents from LINQware, including but not limited to all agreements, memoranda,
 9 and analyses related to such acquisition.

10 **RESPONSE TO REQUEST NO. 18.**

11 In addition to the General Objections, all of which are incorporated by
 12 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 13 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 14 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 15 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 16 that are not relevant to any claims or defenses in the Netflix Litigation and is
 17 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 18 to this Request to the extent it seeks information protected by the attorney-client
 19 privilege, the attorney work-product immunity doctrine, the common interest
 20 privilege, and any other applicable privilege or protection. FIG also objects to this
 21 Request to the extent it seeks third-party documents that FIG is obligated to keep
 22 confidential. FIG objects to this Request to the extent it requires FIG to search for
 23 and produce email in contravention of the applicable ESI Order entered in the
 24 Netflix Litigation.

25 On all of these grounds, FIG objects to producing, and will not produce, any
 26 documents responsive to this Request.

27 **REQUEST NO. 19.**

28 All Communications with Uniloc relating to the acquisition of the LINQware
 29 Portfolio patents.

RESPONSE TO REQUEST NO. 19.

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Request in that it seeks documents that are not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Request to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Request to the extent it seeks third-party documents that FIG is obligated to keep confidential. FIG objects to this Request to the extent it requires FIG to search for and produce email in contravention of the applicable ESI Order entered in the Netflix Litigation.

On all of these grounds, FIG objects to producing, and will not produce, any documents responsive to this Request.

REQUEST NO. 20.

All Communications with LINQware relating to the acquisition of the LINQware Portfolio patents.

RESPONSE TO REQUEST NO. 20.

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Request in that it seeks documents that are not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects

1 to this Request to the extent it seeks information protected by the attorney-client
 2 privilege, the attorney work-product immunity doctrine, the common interest
 3 privilege, and any other applicable privilege or protection. FIG also objects to this
 4 Request to the extent it seeks third-party documents that FIG is obligated to keep
 5 confidential. FIG objects to this Request to the extent it requires FIG to search for
 6 and produce email in contravention of the applicable ESI Order entered in the
 7 Netflix Litigation.

8 On all of these grounds, FIG objects to producing, and will not produce, any
 9 documents responsive to this Request.

10 **REQUEST NO. 21.**

11 All agreements and licenses between You and Uniloc concerning any rights
 12 to any of the LINQware Portfolio patents.

13 **RESPONSE TO REQUEST NO. 21.**

14 In addition to the General Objections, all of which are incorporated by
 15 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 16 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 17 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 18 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 19 that are not relevant to any claims or defenses in the Netflix Litigation and is
 20 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 21 to this Request to the extent it seeks information protected by the attorney-client
 22 privilege, the attorney work-product immunity doctrine, the common interest
 23 privilege, and any other applicable privilege or protection. FIG also objects to this
 24 Request to the extent it seeks third-party documents that FIG is obligated to keep
 25 confidential.

26 On all of these grounds, FIG objects to producing, and will not produce, any
 27 documents responsive to this Request.

28 **REQUEST NO. 22.**

29 All Documents and Communications relating to any valuations of any of the

1 LINQware Portfolio patents.

2 **RESPONSE TO REQUEST NO. 22.**

3 In addition to the General Objections, all of which are incorporated by
 4 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 5 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 6 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 7 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 8 that are not relevant to any claims or defenses in the Netflix Litigation and is
 9 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 10 to this Request to the extent it seeks information protected by the attorney-client
 11 privilege, the attorney work-product immunity doctrine, the common interest
 12 privilege, and any other applicable privilege or protection. FIG also objects to this
 13 Request to the extent it seeks third-party documents that FIG is obligated to keep
 14 confidential. FIG objects to this Request to the extent it requires FIG to search for
 15 and produce email in contravention of the applicable ESI Order entered in the
 16 Netflix Litigation.

17 On all of these grounds, FIG objects to producing, and will not produce, any
 18 documents responsive to this Request.

19 **REQUEST NO. 23.**

20 All Documents and Communications relating to Uniloc 2017's acquisition of
 21 the Uniloc Asserted Patents from Uniloc Luxembourg S.A.

22 **RESPONSE TO REQUEST NO. 23.**

23 In addition to the General Objections, all of which are incorporated by
 24 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 25 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 26 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 27 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 28 that are not relevant to any claims or defenses in the Netflix Litigation and is

1 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 2 to this Request to the extent it seeks information protected by the attorney-client
 3 privilege, the attorney work-product immunity doctrine, the common interest
 4 privilege, and any other applicable privilege or protection. FIG also objects to this
 5 Request to the extent it seeks third-party documents that FIG is obligated to keep
 6 confidential. FIG objects to this Request to the extent it requires FIG to search for
 7 and produce email in contravention of the applicable ESI Order entered in the
 8 Netflix Litigation.

9 On all of these grounds, FIG objects to producing, and will not produce, any
 10 documents responsive to this Request.

11 **REQUEST NO. 24.**

12 All Documents and Communications relating to any valuations of any of the
 13 Uniloc Asserted Patents or any patent portfolio(s) that include any of the Uniloc
 14 Asserted Patents.

15 **RESPONSE TO REQUEST NO. 24.**

16 In addition to the General Objections, all of which are incorporated by
 17 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 18 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 19 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 20 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 21 that are not relevant to any claims or defenses in the Netflix Litigation and is
 22 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 23 to this Request to the extent it seeks information protected by the attorney-client
 24 privilege, the attorney work-product immunity doctrine, the common interest
 25 privilege, and any other applicable privilege or protection. FIG also objects to this
 26 Request to the extent it seeks third-party documents that FIG is obligated to keep
 27 confidential. FIG objects to this Request to the extent it requires FIG to search for
 28 and produce email in contravention of the applicable ESI Order entered in the
 Netflix Litigation.

1 On all of these grounds, FIG objects to producing, and will not produce, any
2 documents responsive to this Request.

3 **REQUEST NO. 25.**

4 All Documents and Communications relating to any valuations of any of the
5 Uniloc Asserted Patents or any patent portfolio(s) that include any of the Uniloc
6 Asserted Patents compared with Your entire patent portfolio.

7 **RESPONSE TO REQUEST NO. 25.**

8 In addition to the General Objections, all of which are incorporated by
9 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
10 broad and unduly burdensome to the extent that it seeks documents from FIG, a
11 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
12 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
13 that are not relevant to any claims or defenses in the Netflix Litigation and is
14 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
15 to this Request to the extent it seeks information protected by the attorney-client
16 privilege, the attorney work-product immunity doctrine, the common interest
17 privilege, and any other applicable privilege or protection. FIG also objects to this
18 Request to the extent it seeks third-party documents that FIG is obligated to keep
19 confidential. FIG objects to this Request to the extent it requires FIG to search for
20 and produce email in contravention of the applicable ESI Order entered in the
Netflix Litigation.

21 On all of these grounds, FIG objects to producing, and will not produce, any
22 documents responsive to this Request.

23 **REQUEST NO. 26.**

24 All Documents and Communications relating to any license agreements
25 conferring any rights to any of the Uniloc Asserted Patents or any patent
26 portfolio(s) that include any of the Uniloc Asserted Patents, including licenses
entered into by You, Uniloc, Uniloc 2017, or any prior assignee.

27 **RESPONSE TO REQUEST NO. 26.**

28 In addition to the General Objections, all of which are incorporated by

1 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 2 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 3 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 4 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 5 that are not relevant to any claims or defenses in the Netflix Litigation and is
 6 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 7 to this Request to the extent it seeks information protected by the attorney-client
 8 privilege, the attorney work-product immunity doctrine, the common interest
 9 privilege, and any other applicable privilege or protection. FIG also objects to this
 10 Request to the extent it seeks third-party documents that FIG is obligated to keep
 11 confidential. FIG objects to this Request to the extent it requires FIG to search for
 12 and produce email in contravention of the applicable ESI Order entered in the
 13 Netflix Litigation.

14 On all of these grounds, FIG objects to producing, and will not produce, any
 15 documents responsive to this Request.

16 **REQUEST NO. 27.**

17 All Documents and Communications relating to any agreements conferring
 18 any financial, ownership, or security interests to any of the Uniloc Asserted Patents
 19 or any patent portfolio(s) that include any of the Uniloc Asserted Patents.

20 **RESPONSE TO REQUEST NO. 27.**

21 In addition to the General Objections, all of which are incorporated by
 22 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 23 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 24 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 25 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 26 that are not relevant to any claims or defenses in the Netflix Litigation and is
 27 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 28 to this Request to the extent it seeks information protected by the attorney-client
 privilege, the attorney work-product immunity doctrine, the common interest

1 privilege, and any other applicable privilege or protection. FIG also objects to this
 2 Request to the extent it seeks third-party documents that FIG is obligated to keep
 3 confidential. FIG objects to this Request to the extent it requires FIG to search for
 4 and produce email in contravention of the applicable ESI Order entered in the
 5 Netflix Litigation.

6 On all of these grounds, FIG objects to producing, and will not produce, any
 7 documents responsive to this Request.

8 **REQUEST NO. 28.**

9 All Communications regarding any of the Uniloc Asserted Patents involving
 10 You, Uniloc 2017, Uniloc, Pendrell, or LINQware.

11 **RESPONSE TO REQUEST NO. 28.**

12 In addition to the General Objections, all of which are incorporated by
 13 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 14 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 15 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 16 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 17 that are not relevant to any claims or defenses in the Netflix Litigation and is
 18 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 19 to this Request to the extent it seeks information protected by the attorney-client
 20 privilege, the attorney work-product immunity doctrine, the common interest
 21 privilege, and any other applicable privilege or protection. FIG also objects to this
 22 Request to the extent it seeks third-party documents that FIG is obligated to keep
 23 confidential. FIG objects to this Request to the extent it requires FIG to search for
 24 and produce email in contravention of the applicable ESI Order entered in the
 25 Netflix Litigation.

26 On all of these grounds, FIG objects to producing, and will not produce, any
 27 documents responsive to this Request.

28 **REQUEST NO. 29.**

29 All Communications regarding any of the Uniloc Asserted Patents involving
 23-

1 any person or entity accused of infringing any of the Uniloc Asserted Patents.

2 **RESPONSE TO REQUEST NO. 29.**

3 In addition to the General Objections, all of which are incorporated by
 4 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 5 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 6 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 7 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 8 that are not relevant to any claims or defenses in the Netflix Litigation and is
 9 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 10 to this Request to the extent it seeks information protected by the attorney-client
 11 privilege, the attorney work-product immunity doctrine, the common interest
 12 privilege, and any other applicable privilege or protection. FIG also objects to this
 13 Request to the extent it seeks third-party documents that FIG is obligated to keep
 14 confidential. FIG objects to this Request to the extent it requires FIG to search for
 15 and produce email in contravention of the applicable ESI Order entered in the
 16 Netflix Litigation.

17 On all of these grounds, FIG objects to producing, and will not produce, any
 18 documents responsive to this Request.

19 **REQUEST NO. 30.**

20 All Communications regarding any of the Uniloc Asserted Patents and
 21 Netflix.

22 **RESPONSE TO REQUEST NO. 30.**

23 In addition to the General Objections, all of which are incorporated by
 24 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 25 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 26 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 27 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 28 that are not relevant to any claims or defenses in the Netflix Litigation and is

1 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 2 to this Request to the extent it seeks information protected by the attorney-client
 3 privilege, the attorney work-product immunity doctrine, the common interest
 4 privilege, and any other applicable privilege or protection. FIG also objects to this
 5 Request to the extent it seeks third-party documents that FIG is obligated to keep
 6 confidential. FIG objects to this Request to the extent it requires FIG to search for
 7 and produce email in contravention of the applicable ESI Order entered in the
 8 Netflix Litigation.

9 On all of these grounds, FIG objects to producing, and will not produce, any
 10 documents responsive to this Request.

11 **REQUEST NO. 31.**

12 Documents sufficient to show Your and Uniloc 2017's financial condition
 13 between 2013 and the present including but not limited to balance sheets, income
 14 statements, profit and loss statements, cash flow statements, and other financial
 15 documents reflecting Your and Uniloc 2017's revenues, profits, and losses.

16 **RESPONSE TO REQUEST NO. 31.**

17 In addition to the General Objections, all of which are incorporated by
 18 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 19 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 20 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 21 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 22 that are not relevant to any claims or defenses in the Netflix Litigation and is
 23 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 24 to this Request to the extent it seeks information protected by the attorney-client
 25 privilege, the attorney work-product immunity doctrine, the common interest
 26 privilege, and any other applicable privilege or protection. FIG also objects to this
 27 Request to the extent it seeks third-party documents that FIG is obligated to keep
 28 confidential.

On all of these grounds, FIG objects to producing, and will not produce, any

1 documents responsive to this Request.

2 **REQUEST NO. 32.**

3 All Documents and Communications relating to any ability by anyone at any
4 time to grant a license, release, or covenant under any of the Uniloc Asserted
Patents.

5 **RESPONSE TO REQUEST NO. 32.**

6 In addition to the General Objections, all of which are incorporated by
7 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
8 broad and unduly burdensome to the extent that it seeks documents from FIG, a
9 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
10 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
11 that are not relevant to any claims or defenses in the Netflix Litigation and is
12 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
13 to this Request to the extent it seeks information protected by the attorney-client
14 privilege, the attorney work-product immunity doctrine, the common interest
15 privilege, and any other applicable privilege or protection. FIG also objects to this
16 Request to the extent it seeks third-party documents that FIG is obligated to keep
17 confidential. FIG objects to this Request to the extent it requires FIG to search for
18 and produce email in contravention of the applicable ESI Order entered in the
19 Netflix Litigation.

20 On all of these grounds, FIG objects to producing, and will not produce, any
21 documents responsive to this Request.

22 **REQUEST NO. 33.**

23 All Documents and Communications concerning legal proceedings in which
any of the Uniloc Asserted Patents is asserted for infringement.

24 **RESPONSE TO REQUEST NO. 33.**

25 In addition to the General Objections, all of which are incorporated by
26 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
27 broad and unduly burdensome to the extent that it seeks documents from FIG, a
28

1 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 2 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 3 that are not relevant to any claims or defenses in the Netflix Litigation and is
 4 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 5 to this Request to the extent it seeks information protected by the attorney-client
 6 privilege, the attorney work-product immunity doctrine, the common interest
 7 privilege, and any other applicable privilege or protection. FIG also objects to this
 8 Request to the extent it seeks third-party documents that FIG is obligated to keep
 9 confidential. FIG objects to this Request to the extent it requires FIG to search for
 10 and produce email in contravention of the applicable ESI Order entered in the
 11 Netflix Litigation.

12 On all of these grounds, FIG objects to producing, and will not produce, any
 13 documents responsive to this Request.

14 **REQUEST NO. 34.**

15 All Documents including or relating to any analysis of revenue projections
 16 and return on investment of any of the Uniloc Asserted Patents or any patent
 17 portfolio(s) that include any of the Uniloc Asserted Patents.

18 **RESPONSE TO REQUEST NO. 34.**

19 In addition to the General Objections, all of which are incorporated by
 20 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 21 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 22 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 23 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 24 that are not relevant to any claims or defenses in the Netflix Litigation and is
 25 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 26 to this Request to the extent it seeks information protected by the attorney-client
 27 privilege, the attorney work-product immunity doctrine, the common interest
 28 privilege, and any other applicable privilege or protection. FIG also objects to this
 Request to the extent it seeks third-party documents that FIG is obligated to keep

1 confidential. FIG objects to this Request to the extent it requires FIG to search for
 2 and produce email in contravention of the applicable ESI Order entered in the
 3 Netflix Litigation.

4 On all of these grounds, FIG objects to producing, and will not produce, any
 5 documents responsive to this Request.

6 **REQUEST NO. 35.**

7 All Documents relating to any analysis of assertion for infringement of any
 8 of the Uniloc Asserted Patents or any patent portfolio(s) that include any of the
 9 Uniloc Asserted Patents.

10 **RESPONSE TO REQUEST NO. 35.**

11 In addition to the General Objections, all of which are incorporated by
 12 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 13 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 14 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 15 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 16 that are not relevant to any claims or defenses in the Netflix Litigation and is
 17 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 18 to this Request to the extent it seeks information protected by the attorney-client
 19 privilege, the attorney work-product immunity doctrine, the common interest
 20 privilege, and any other applicable privilege or protection. FIG also objects to this
 21 Request to the extent it seeks third-party documents that FIG is obligated to keep
 22 confidential. FIG objects to this Request to the extent it requires FIG to search for
 23 and produce email in contravention of the applicable ESI Order entered in the
 24 Netflix Litigation.

25 On all of these grounds, FIG objects to producing, and will not produce, any
 26 documents responsive to this Request.

27 **REQUEST NO. 36.**

28 All Documents relating to any financial interest You have in any settlement,
 judgment, damages award, or other relief that results from assertion of the Uniloc

1 Asserted Patents or any patent portfolio(s) that include any of the Uniloc Asserted
 2 Patents.

3 **RESPONSE TO REQUEST NO. 36.**

4 In addition to the General Objections, all of which are incorporated by
 5 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 6 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 7 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 8 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 9 that are not relevant to any claims or defenses in the Netflix Litigation and is
 10 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 11 to this Request to the extent it seeks information protected by the attorney-client
 12 privilege, the attorney work-product immunity doctrine, the common interest
 13 privilege, and any other applicable privilege or protection. FIG also objects to this
 14 Request to the extent it seeks third-party documents that FIG is obligated to keep
 15 confidential. FIG objects to this Request to the extent it requires FIG to search for
 16 and produce email in contravention of the applicable ESI Order entered in the
 17 Netflix Litigation.

18 On all of these grounds, FIG objects to producing, and will not produce, any
 19 documents responsive to this Request.

20 **REQUEST NO. 37.**

21 All Documents and Communications relating to Netflix's alleged
 22 infringement of any of the Uniloc Asserted Patents.

23 **RESPONSE TO REQUEST NO. 37.**

24 In addition to the General Objections, all of which are incorporated by
 25 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 26 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 27 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 28 including Uniloc 2017. FIG also objects to this Request in that it seeks documents

1 that are not relevant to any claims or defenses in the Netflix Litigation and is
2 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
3 to this Request to the extent it seeks information protected by the attorney-client
4 privilege, the attorney work-product immunity doctrine, the common interest
5 privilege, and any other applicable privilege or protection. FIG also objects to this
6 Request to the extent it seeks third-party documents that FIG is obligated to keep
7 confidential. FIG objects to this Request to the extent it requires FIG to search for
8 and produce email in contravention of the applicable ESI Order entered in the
9 Netflix Litigation.

10 On all of these grounds, FIG objects to producing, and will not produce, any
11 documents responsive to this Request.

12 **REQUEST NO. 38.**

13 All Documents and Communications relating to the decision to initiate this
14 Litigation against Netflix.

15 **RESPONSE TO REQUEST NO. 38.**

16 In addition to the General Objections, all of which are incorporated by
17 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
18 broad and unduly burdensome to the extent that it seeks documents from FIG, a
19 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
20 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
21 that are not relevant to any claims or defenses in the Netflix Litigation and is
22 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
23 to this Request to the extent it seeks information protected by the attorney-client
24 privilege, the attorney work-product immunity doctrine, the common interest
25 privilege, and any other applicable privilege or protection. FIG also objects to this
26 Request to the extent it seeks third-party documents that FIG is obligated to keep
27 confidential. FIG objects to this Request to the extent it requires FIG to search for
28 and produce email in contravention of the applicable ESI Order entered in the

1 Netflix Litigation.

2 On all of these grounds, FIG objects to producing, and will not produce, any
3 documents responsive to this Request.

4 **REQUEST NO. 39.**

5 All Documents and Communications relating to any valuation of the
6 assertion of the Uniloc Asserted Patents against Netflix.

7 **RESPONSE TO REQUEST NO. 39.**

8 In addition to the General Objections, all of which are incorporated by
9 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
10 broad and unduly burdensome to the extent that it seeks documents from FIG, a
11 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
12 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
13 that are not relevant to any claims or defenses in the Netflix Litigation and is
14 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
15 to this Request to the extent it seeks information protected by the attorney-client
16 privilege, the attorney work-product immunity doctrine, the common interest
17 privilege, and any other applicable privilege or protection. FIG also objects to this
18 Request to the extent it seeks third-party documents that FIG is obligated to keep
19 confidential. FIG objects to this Request to the extent it requires FIG to search for
20 and produce email in contravention of the applicable ESI Order entered in the
21 Netflix Litigation.

22 On all of these grounds, FIG objects to producing, and will not produce, any
23 documents responsive to this Request.

24 **REQUEST NO. 40.**

25 All Documents relating to Your funding of this Litigation against Netflix.

26 **RESPONSE TO REQUEST NO. 40.**

27 In addition to the General Objections, all of which are incorporated by
28 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
broad and unduly burdensome to the extent that it seeks documents from FIG, a

1 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 2 including Uniloc 2017. FIG objects to the phrase “funding of this Litigation” as
 3 vague and ambiguous. FIG also objects to this Request in that it seeks documents
 4 that are not relevant to any claims or defenses in the Netflix Litigation and is
 5 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 6 to this Request to the extent it seeks information protected by the attorney-client
 7 privilege, the attorney work-product immunity doctrine, the common interest
 8 privilege, and any other applicable privilege or protection. FIG also objects to this
 9 Request to the extent it seeks third-party documents that FIG is obligated to keep
 10 confidential. FIG objects to this Request to the extent it requires FIG to search for
 11 and produce email in contravention of the applicable ESI Order entered in the
 12 Netflix Litigation.

13 On all of these grounds, FIG objects to producing, and will not produce, any
 14 documents responsive to this Request.

15 **REQUEST NO. 41.**

16 All Documents relating to Your financial interest in the outcome of this
 17 Litigation against Netflix.

18 **RESPONSE TO REQUEST NO. 41.**

19 In addition to the General Objections, all of which are incorporated by
 20 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 21 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 22 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 23 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 24 that are not relevant to any claims or defenses in the Netflix Litigation and is
 25 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 26 to this Request to the extent it seeks information protected by the attorney-client
 27 privilege, the attorney work-product immunity doctrine, the common interest
 28 privilege, and any other applicable privilege or protection. FIG also objects to this

1 Request to the extent it seeks third-party documents that FIG is obligated to keep
 2 confidential. FIG objects to this Request to the extent it requires FIG to search for
 3 and produce email in contravention of the applicable ESI Order entered in the
 4 Netflix Litigation.

5 On all of these grounds, FIG objects to producing, and will not produce, any
 6 documents responsive to this Request.

7 **REQUEST NO. 42.**

8 All Documents relating to Your financial gains, profits, or revenues that may
 9 be attributed to the '229 Patent.

10 **RESPONSE TO REQUEST NO. 42.**

11 In addition to the General Objections, all of which are incorporated by
 12 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 13 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 14 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 15 including Uniloc 2017. FIG objects to the phrase "financial gains, profits, or
 16 revenues" as vague and ambiguous. FIG also objects to this Request in that it seeks
 17 documents that are not relevant to any claims or defenses in the Netflix Litigation
 18 and is therefore not proportional to the needs of the Netflix Litigation. FIG further
 19 objects to this Request to the extent it seeks information protected by the attorney-
 20 client privilege, the attorney work-product immunity doctrine, the common interest
 21 privilege, and any other applicable privilege or protection. FIG also objects to this
 22 Request to the extent it seeks third-party documents that FIG is obligated to keep
 23 confidential. FIG objects to this Request to the extent it requires FIG to search for
 24 and produce email in contravention of the applicable ESI Order entered in the
 25 Netflix Litigation.

26 On all of these grounds, FIG objects to producing, and will not produce, any
 27 documents responsive to this Request.

28 **REQUEST NO. 43.**

29 All Documents relating to Your financial gains, profits, or revenues that may

1 be attributed to the '609 Patent.

2 **RESPONSE TO REQUEST NO. 43.**

3 In addition to the General Objections, all of which are incorporated by
 4 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 5 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 6 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 7 including Uniloc 2017. FIG objects to the phrase "financial gains, profits, or
 8 revenues" as vague and ambiguous. FIG also objects to this Request in that it seeks
 9 documents that are not relevant to any claims or defenses in the Netflix Litigation
 10 and is therefore not proportional to the needs of the Netflix Litigation. FIG further
 11 objects to this Request to the extent it seeks information protected by the attorney-
 12 client privilege, the attorney work-product immunity doctrine, the common interest
 13 privilege, and any other applicable privilege or protection. FIG also objects to this
 14 Request to the extent it seeks third-party documents that FIG is obligated to keep
 15 confidential. FIG objects to this Request to the extent it requires FIG to search for
 16 and produce email in contravention of the applicable ESI Order entered in the
 17 Netflix Litigation.

18 On all of these grounds, FIG objects to producing, and will not produce, any
 19 documents responsive to this Request.

20 **REQUEST NO. 44.**

21 All Documents relating to Your financial gains, profits, or revenues that may
 22 be attributed to the '273 Patent.

23 **RESPONSE TO REQUEST NO. 44.**

24 In addition to the General Objections, all of which are incorporated by
 25 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 26 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 27 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 28 including Uniloc 2017. FIG objects to the phrase "financial gains, profits, or

1 revenues” as vague and ambiguous. FIG also objects to this Request in that it seeks
 2 documents that are not relevant to any claims or defenses in the Netflix Litigation
 3 and is therefore not proportional to the needs of the Netflix Litigation. FIG further
 4 objects to this Request to the extent it seeks information protected by the attorney-
 5 client privilege, the attorney work-product immunity doctrine, the common interest
 6 privilege, and any other applicable privilege or protection. FIG also objects to this
 7 Request to the extent it seeks third-party documents that FIG is obligated to keep
 8 confidential. FIG objects to this Request to the extent it requires FIG to search for
 9 and produce email in contravention of the applicable ESI Order entered in the
 10 Netflix Litigation.

11 On all of these grounds, FIG objects to producing, and will not produce, any
 12 documents responsive to this Request.

13 **REQUEST NO. 45.**

14 All Documents and Communications relating to Your offers, requests,
 15 discussion, and negotiations to provide a license to the '229 Patent.

16 **RESPONSE TO REQUEST NO. 45.**

17 In addition to the General Objections, all of which are incorporated by
 18 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 19 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 20 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks
 21 documents that are not relevant to any claims or defenses in the Netflix Litigation
 22 and is therefore not proportional to the needs of the Netflix Litigation. FIG further
 23 objects to this Request to the extent it seeks information protected by the attorney-
 24 client privilege, the attorney work-product immunity doctrine, the common interest
 25 privilege, and any other applicable privilege or protection. FIG also objects to this
 26 Request to the extent it seeks third-party documents that FIG is obligated to keep
 27 confidential. FIG objects to this Request to the extent it requires FIG to search for
 28 and produce email in contravention of the applicable ESI Order entered in the

1 Netflix Litigation.

2 On all of these grounds, FIG objects to producing, and will not produce, any
3 documents responsive to this Request.

4 **REQUEST NO. 46.**

5 All Documents and Communications relating to Your offers, requests,
6 discussion, and negotiations to provide a license to the '609 Patent.

7 **RESPONSE TO REQUEST NO. 46.**

8 In addition to the General Objections, all of which are incorporated by
9 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
10 broad and unduly burdensome to the extent that it seeks documents from FIG, a
11 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks
12 documents that are not relevant to any claims or defenses in the Netflix Litigation
13 and is therefore not proportional to the needs of the Netflix Litigation. FIG further
14 objects to this Request to the extent it seeks information protected by the attorney-
15 client privilege, the attorney work-product immunity doctrine, the common interest
16 privilege, and any other applicable privilege or protection. FIG also objects to this
17 Request to the extent it seeks third-party documents that FIG is obligated to keep
18 confidential. FIG objects to this Request to the extent it requires FIG to search for
19 and produce email in contravention of the applicable ESI Order entered in the
20 Netflix Litigation.

21 On all of these grounds, FIG objects to producing, and will not produce, any
22 documents responsive to this Request.

23 **REQUEST NO. 47.**

24 All Documents and Communications relating to Your offers, requests,
25 discussion, and negotiations to provide a license to the '273 Patent.

26 **RESPONSE TO REQUEST NO. 47.**

27 In addition to the General Objections, all of which are incorporated by
28 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
broad and unduly burdensome to the extent that it seeks documents from FIG, a

1 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks
 2 documents that are not relevant to any claims or defenses in the Netflix Litigation
 3 and is therefore not proportional to the needs of the Netflix Litigation. FIG further
 4 objects to this Request to the extent it seeks information protected by the attorney-
 5 client privilege, the attorney work-product immunity doctrine, the common interest
 6 privilege, and any other applicable privilege or protection. FIG also objects to this
 7 Request to the extent it seeks third-party documents that FIG is obligated to keep
 8 confidential. FIG objects to this Request to the extent it requires FIG to search for
 9 and produce email in contravention of the applicable ESI Order entered in the
 10 Netflix Litigation.

11 On all of these grounds, FIG objects to producing, and will not produce, any
 12 documents responsive to this Request.

13 **REQUEST NO. 48.**

14 All Documents and Communications referenced in the May 3, 2018 Payoff
 15 and Termination Agreement (produced at UNILOC_0004017).

16 **RESPONSE TO REQUEST NO. 48.**

17 In addition to the General Objections, all of which are incorporated by
 18 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 19 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 20 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 21 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 22 that are not relevant to any claims or defenses in the Netflix Litigation and is
 23 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 24 to this Request to the extent it seeks information protected by the attorney-client
 25 privilege, the attorney work-product immunity doctrine, the common interest
 26 privilege, and any other applicable privilege or protection. FIG also objects to this
 27 Request to the extent it seeks third-party documents that FIG is obligated to keep
 28 confidential. FIG objects to this Request to the extent it requires FIG to search for

1 and produce email in contravention of the applicable ESI Order entered in the
 2 Netflix Litigation.

3 On all of these grounds, FIG objects to producing, and will not produce, any
 4 documents responsive to this Request.

5 **REQUEST NO. 49.**

6 All Documents and Communications addressing or relating to the relative
 7 value of any of the Uniloc Asserted Patents in relation to other patents, including
 8 but not limited to relative value of any of the Uniloc Asserted Patents compared to
 other patents that were acquired as part of the same portfolio or other patents
 licensed as part of the same portfolio.

9 **RESPONSE TO REQUEST NO. 49.**

10 In addition to the General Objections, all of which are incorporated by
 11 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 12 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 13 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 14 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 15 that are not relevant to any claims or defenses in the Netflix Litigation and is
 16 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 17 to this Request to the extent it seeks information protected by the attorney-client
 18 privilege, the attorney work-product immunity doctrine, the common interest
 19 privilege, and any other applicable privilege or protection. FIG also objects to this
 20 Request to the extent it seeks third-party documents that FIG is obligated to keep
 21 confidential. FIG objects to this Request to the extent it requires FIG to search for
 22 and produce email in contravention of the applicable ESI Order entered in the
 23 Netflix Litigation.

24 On all of these grounds, FIG objects to producing, and will not produce, any
 25 documents responsive to this Request.

26 **REQUEST NO. 50.**

27 Any business plan that references this Litigation.

RESPONSE TO REQUEST NO. 50.

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Request in that it seeks documents that are not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Request to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Request to the extent it seeks third-party documents that FIG is obligated to keep confidential.

On all of these grounds, FIG objects to producing, and will not produce, any documents responsive to this Request.

REQUEST NO. 51.

Any business plan that references Netflix.

RESPONSE TO REQUEST NO. 51.

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Request in that it seeks documents that are not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Request to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this

1 Request to the extent it seeks third-party documents that FIG is obligated to keep
2 confidential.

3 On all of these grounds, FIG objects to producing, and will not produce, any
4 documents responsive to this Request.

5 **REQUEST NO. 52.**

6 Any business plan that references the Uniloc Asserted Patents.

7 **RESPONSE TO REQUEST NO. 52.**

8 In addition to the General Objections, all of which are incorporated by
9 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
10 broad and unduly burdensome to the extent that it seeks documents from FIG, a
11 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
12 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
13 that are not relevant to any claims or defenses in the Netflix Litigation and is
14 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
15 to this Request to the extent it seeks information protected by the attorney-client
16 privilege, the attorney work-product immunity doctrine, the common interest
17 privilege, and any other applicable privilege or protection. FIG also objects to this
18 Request to the extent it seeks third-party documents that FIG is obligated to keep
19 confidential.

20 On all of these grounds, FIG objects to producing, and will not produce, any
21 documents responsive to this Request.

22 **REQUEST NO. 53.**

23 Any business plan that references the Pendrell Portfolio or any of the assets
therein.

24 **RESPONSE TO REQUEST NO. 53.**

25 In addition to the General Objections, all of which are incorporated by
26 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
27 broad and unduly burdensome to the extent that it seeks documents from FIG, a
28 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks
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1 documents that are not relevant to any claims or defenses in the Netflix Litigation
2 and is therefore not proportional to the needs of the Netflix Litigation. FIG further
3 objects to this Request to the extent it seeks information protected by the attorney-
4 client privilege, the attorney work-product immunity doctrine, the common interest
5 privilege, and any other applicable privilege or protection. FIG also objects to this
6 Request to the extent it seeks third-party documents that FIG is obligated to keep
7 confidential.

8 On all of these grounds, FIG objects to producing, and will not produce, any
9 documents responsive to this Request.

10 **REQUEST NO. 54.**

11 Any business plan that references the LINQware Portfolio or any of the
12 assets therein.

13 **RESPONSE TO REQUEST NO. 54.**

14 In addition to the General Objections, all of which are incorporated by
15 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
16 broad and unduly burdensome to the extent that it seeks documents from FIG, a
17 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks
18 documents that are not relevant to any claims or defenses in the Netflix Litigation
19 and is therefore not proportional to the needs of the Netflix Litigation. FIG further
20 objects to this Request to the extent it seeks information protected by the attorney-
21 client privilege, the attorney work-product immunity doctrine, the common interest
22 privilege, and any other applicable privilege or protection. FIG also objects to this
23 Request to the extent it seeks third-party documents that FIG is obligated to keep
24 confidential.

25 On all of these grounds, FIG objects to producing, and will not produce, any
26 documents responsive to this Request.

27 **REQUEST NO. 55.**

28 Any communication to investors that references this Litigation.

1 **RESPONSE TO REQUEST NO. 55.**

2 In addition to the General Objections, all of which are incorporated by
3 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
4 broad and unduly burdensome to the extent that it seeks documents from FIG, a
5 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks
6 documents that are not relevant to any claims or defenses in the Netflix Litigation
7 and is therefore not proportional to the needs of the Netflix Litigation. FIG further
8 objects to this Request to the extent it seeks information protected by the attorney-
9 client privilege, the attorney work-product immunity doctrine, the common interest
10 privilege, and any other applicable privilege or protection. FIG also objects to this
11 Request to the extent it seeks third-party documents that FIG is obligated to keep
12 confidential. FIG objects to this Request to the extent it requires FIG to search for
13 and produce email in contravention of the applicable ESI Order entered in the
14 Netflix Litigation.

15 On all of these grounds, FIG objects to producing, and will not produce, any
16 documents responsive to this Request.

17 **REQUEST NO. 56.**

18 Any communication to investors that references Netflix.

19 **RESPONSE TO REQUEST NO. 56.**

20 In addition to the General Objections, all of which are incorporated by
21 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
22 broad and unduly burdensome to the extent that it seeks documents from FIG, a
23 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks
24 documents that are not relevant to any claims or defenses in the Netflix Litigation
25 and is therefore not proportional to the needs of the Netflix Litigation. FIG further
26 objects to this Request to the extent it seeks information protected by the attorney-
27 client privilege, the attorney work-product immunity doctrine, the common interest
28 privilege, and any other applicable privilege or protection. FIG also objects to this

1 Request to the extent it seeks third-party documents that FIG is obligated to keep
 2 confidential. FIG objects to this Request to the extent it requires FIG to search for
 3 and produce email in contravention of the applicable ESI Order entered in the
 4 Netflix Litigation.

5 On all of these grounds, FIG objects to producing, and will not produce, any
 6 documents responsive to this Request.

7 **REQUEST NO. 57.**

8 Any communication to investors that references the Uniloc Asserted Patents.

9 **RESPONSE TO REQUEST NO. 57.**

10 In addition to the General Objections, all of which are incorporated by
 11 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 12 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 13 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks
 14 documents that are not relevant to any claims or defenses in the Netflix Litigation
 15 and is therefore not proportional to the needs of the Netflix Litigation. FIG further
 16 objects to this Request to the extent it seeks information protected by the attorney-
 17 client privilege, the attorney work-product immunity doctrine, the common interest
 18 privilege, and any other applicable privilege or protection. FIG also objects to this
 19 Request to the extent it seeks third-party documents that FIG is obligated to keep
 20 confidential. FIG objects to this Request to the extent it requires FIG to search for
 21 and produce email in contravention of the applicable ESI Order entered in the
 22 Netflix Litigation.

23 On all of these grounds, FIG objects to producing, and will not produce, any
 24 documents responsive to this Request.

25 **REQUEST NO. 58.**

26 Any communication to investors that references the Pendrell Portfolio or any
 27 of the assets therein.

28 **RESPONSE TO REQUEST NO. 58.**

29 In addition to the General Objections, all of which are incorporated by

1 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 2 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 3 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks
 4 documents that are not relevant to any claims or defenses in the Netflix Litigation
 5 and is therefore not proportional to the needs of the Netflix Litigation. FIG further
 6 objects to this Request to the extent it seeks information protected by the attorney-
 7 client privilege, the attorney work-product immunity doctrine, the common interest
 8 privilege, and any other applicable privilege or protection. FIG also objects to this
 9 Request to the extent it seeks third-party documents that FIG is obligated to keep
 10 confidential. FIG objects to this Request to the extent it requires FIG to search for
 11 and produce email in contravention of the applicable ESI Order entered in the
 12 Netflix Litigation.

13 On all of these grounds, FIG objects to producing, and will not produce, any
 14 documents responsive to this Request.

15 **REQUEST NO. 59.**

16 Any communication to investors that references the LINQware Portfolio or
 17 any of the assets therein.

18 **RESPONSE TO REQUEST NO. 59.**

19 In addition to the General Objections, all of which are incorporated by
 20 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 21 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 22 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks
 23 documents that are not relevant to any claims or defenses in the Netflix Litigation
 24 and is therefore not proportional to the needs of the Netflix Litigation. FIG further
 25 objects to this Request to the extent it seeks information protected by the attorney-
 26 client privilege, the attorney work-product immunity doctrine, the common interest
 27 privilege, and any other applicable privilege or protection. FIG also objects to this
 28 Request to the extent it seeks third-party documents that FIG is obligated to keep

1 confidential. FIG objects to this Request to the extent it requires FIG to search for
 2 and produce email in contravention of the applicable ESI Order entered in the
 3 Netflix Litigation.

4 On all of these grounds, FIG objects to producing, and will not produce, any
 5 documents responsive to this Request.

6 **REQUEST NO. 60.**

7 Any communication with or report to Softbank Corp. regarding this
 8 Litigation.

9 **RESPONSE TO REQUEST NO. 60.**

10 In addition to the General Objections, all of which are incorporated by
 11 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 12 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 13 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks
 14 documents that are not relevant to any claims or defenses in the Netflix Litigation
 15 and is therefore not proportional to the needs of the Netflix Litigation. FIG further
 16 objects to this Request to the extent it seeks information protected by the attorney-
 17 client privilege, the attorney work-product immunity doctrine, the common interest
 18 privilege, and any other applicable privilege or protection. FIG also objects to this
 19 Request to the extent it seeks third-party documents that FIG is obligated to keep
 20 confidential. FIG objects to this Request to the extent it requires FIG to search for
 21 and produce email in contravention of the applicable ESI Order entered in the
 22 Netflix Litigation.

23 On all of these grounds, FIG objects to producing, and will not produce, any
 24 documents responsive to this Request.

25 **REQUEST NO. 61.**

26 Any communication with or report to Softbank Corp. regarding Netflix.

27 **RESPONSE TO REQUEST NO. 61.**

28 In addition to the General Objections, all of which are incorporated by
 29 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 -45-

1 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 2 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks
 3 documents that are not relevant to any claims or defenses in the Netflix Litigation
 4 and is therefore not proportional to the needs of the Netflix Litigation. FIG further
 5 objects to this Request to the extent it seeks information protected by the attorney-
 6 client privilege, the attorney work-product immunity doctrine, the common interest
 7 privilege, and any other applicable privilege or protection. FIG also objects to this
 8 Request to the extent it seeks third-party documents that FIG is obligated to keep
 9 confidential. FIG objects to this Request to the extent it requires FIG to search for
 10 and produce email in contravention of the applicable ESI Order entered in the
 11 Netflix Litigation.

12 On all of these grounds, FIG objects to producing, and will not produce, any
 13 documents responsive to this Request.

14 **REQUEST NO. 62.**

15 Any communication with or report to Softbank Corp. regarding the Uniloc
 16 Asserted Patents.

17 **RESPONSE TO REQUEST NO. 62.**

18 In addition to the General Objections, all of which are incorporated by
 19 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 20 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 21 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks
 22 documents that are not relevant to any claims or defenses in the Netflix Litigation
 23 and is therefore not proportional to the needs of the Netflix Litigation. FIG further
 24 objects to this Request to the extent it seeks information protected by the attorney-
 25 client privilege, the attorney work-product immunity doctrine, the common interest
 26 privilege, and any other applicable privilege or protection. FIG also objects to this
 27 Request to the extent it seeks third-party documents that FIG is obligated to keep
 28 confidential. FIG objects to this Request to the extent it requires FIG to search for

1 and produce email in contravention of the applicable ESI Order entered in the
2 Netflix Litigation.

3 On all of these grounds, FIG objects to producing, and will not produce, any
4 documents responsive to this Request.

5 **REQUEST NO. 63.**

6 Any communication with or report to Softbank Corp. regarding the Pendrell
7 Portfolio or any of the assets therein.

8 **RESPONSE TO REQUEST NO. 63.**

9 In addition to the General Objections, all of which are incorporated by
10 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
11 broad and unduly burdensome to the extent that it seeks documents from FIG, a
12 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks
13 documents that are not relevant to any claims or defenses in the Netflix Litigation
14 and is therefore not proportional to the needs of the Netflix Litigation. FIG further
15 objects to this Request to the extent it seeks information protected by the attorney-
16 client privilege, the attorney work-product immunity doctrine, the common interest
17 privilege, and any other applicable privilege or protection. FIG also objects to this
18 Request to the extent it seeks third-party documents that FIG is obligated to keep
19 confidential. FIG objects to this Request to the extent it requires FIG to search for
20 and produce email in contravention of the applicable ESI Order entered in the
21 Netflix Litigation.

22 On all of these grounds, FIG objects to producing, and will not produce, any
23 documents responsive to this Request.

24 **REQUEST NO. 64.**

25 Any communication with or report to Softbank Corp. regarding the
26 LINQware Portfolio or any of the assets therein.

27 **RESPONSE TO REQUEST NO. 64.**

28 In addition to the General Objections, all of which are incorporated by
specific reference herein, FIG objects to this Request as vague, ambiguous, overly

1 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 2 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks
 3 documents that are not relevant to any claims or defenses in the Netflix Litigation
 4 and is therefore not proportional to the needs of the Netflix Litigation. FIG further
 5 objects to this Request to the extent it seeks information protected by the attorney-
 6 client privilege, the attorney work-product immunity doctrine, the common interest
 7 privilege, and any other applicable privilege or protection. FIG also objects to this
 8 Request to the extent it seeks third-party documents that FIG is obligated to keep
 9 confidential. FIG objects to this Request to the extent it requires FIG to search for
 10 and produce email in contravention of the applicable ESI Order entered in the
 11 Netflix Litigation.

12 On all of these grounds, FIG objects to producing, and will not produce, any
 13 documents responsive to this Request.

14 **REQUEST NO. 65.**

15 Any forecasts and/or outlook on any possible results related to this Litigation,
 16 Netflix, the Uniloc Asserted Patents, the Pendrell Portfolio or any of the assets
 17 therein, and/or LINQware Portfolio or any of the assets therein.

18 **RESPONSE TO REQUEST NO. 65.**

19 In addition to the General Objections, all of which are incorporated by
 20 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 21 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 22 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks
 23 documents that are not relevant to any claims or defenses in the Netflix Litigation
 24 and is therefore not proportional to the needs of the Netflix Litigation. FIG further
 25 objects to this Request to the extent it seeks information protected by the attorney-
 26 client privilege, the attorney work-product immunity doctrine, the common interest
 27 privilege, and any other applicable privilege or protection. FIG also objects to this
 28 Request to the extent it seeks third-party documents that FIG is obligated to keep
 confidential. FIG objects to this Request to the extent it requires FIG to search for

1 and produce email in contravention of the applicable ESI Order entered in the
 2 Netflix Litigation.

3 On all of these grounds, FIG objects to producing, and will not produce, any
 4 documents responsive to this Request.

5 **REQUEST NO. 66.**

6 All Documents and Communications relating to patent assertion strategy
 7 involving any of the Uniloc Asserted Patents or any patent portfolio(s) that include
 8 any of the Uniloc Asserted Patents.

9 **RESPONSE TO REQUEST NO. 66.**

10 In addition to the General Objections, all of which are incorporated by
 11 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 12 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 13 non-party to the Netflix Litigation, that Netflix can obtain from other sources,
 14 including Uniloc 2017. FIG also objects to this Request in that it seeks documents
 15 that are not relevant to any claims or defenses in the Netflix Litigation and is
 16 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 17 to this Request to the extent it seeks information protected by the attorney-client
 18 privilege, the attorney work-product immunity doctrine, the common interest
 19 privilege, and any other applicable privilege or protection. FIG also objects to this
 20 Request to the extent it seeks third-party documents that FIG is obligated to keep
 21 confidential. FIG objects to this Request to the extent it requires FIG to search for
 22 and produce email in contravention of the applicable ESI Order entered in the
 23 Netflix Litigation.

24 On all of these grounds, FIG objects to producing, and will not produce, any
 25 documents responsive to this Request.

26 **REQUEST NO. 67.**

27 All Documents and Communications relating to Softbank Corp.'s decision to
 28 invest in You, including but not limited to any valuation conducted by Softbank
 Corp. of the Uniloc Asserted Patents or any patent portfolio(s) that include any of
 the Uniloc Asserted Patents.

1 **RESPONSE TO REQUEST NO. 67.**

2 In addition to the General Objections, all of which are incorporated by
 3 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 4 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 5 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks
 6 documents that are not relevant to any claims or defenses in the Netflix Litigation
 7 and is therefore not proportional to the needs of the Netflix Litigation. FIG further
 8 objects to this Request to the extent it seeks information protected by the attorney-
 9 client privilege, the attorney work-product immunity doctrine, the common interest
 10 privilege, and any other applicable privilege or protection. FIG also objects to this
 11 Request to the extent it seeks third-party documents that FIG is obligated to keep
 12 confidential. FIG objects to this Request to the extent it requires FIG to search for
 13 and produce email in contravention of the applicable ESI Order entered in the
 14 Netflix Litigation.

15 On all of these grounds, FIG objects to producing, and will not produce, any
 16 documents responsive to this Request.

17 **REQUEST NO. 68.**

18 All Documents and Communications relating to any agreement involving
 19 Your investment in or ownership of any patent assertion entity and the reasons for
 20 any subsequent change or modification in the terms of any such agreement.

21 **RESPONSE TO REQUEST NO. 68.**

22 In addition to the General Objections, all of which are incorporated by
 23 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 24 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 25 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks
 26 documents that are not relevant to any claims or defenses in the Netflix Litigation
 27 and is therefore not proportional to the needs of the Netflix Litigation. FIG further
 28 objects to this Request to the extent it seeks information protected by the attorney-
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1 privilege, and any other applicable privilege or protection. FIG also objects to this
 2 Request to the extent it seeks third-party documents that FIG is obligated to keep
 3 confidential. FIG objects to this Request to the extent it requires FIG to search for
 4 and produce email in contravention of the applicable ESI Order entered in the
 5 Netflix Litigation.

6 On all of these grounds, FIG objects to producing, and will not produce, any
 7 documents responsive to this Request.

8 **REQUEST NO. 69.**

9 All Documents and Communications relating to Your strategy to drive up the
 10 costs of defense in any patent assertion campaigns in which You are a party.

11 **RESPONSE TO REQUEST NO. 69.**

12 In addition to the General Objections, all of which are incorporated by
 13 specific reference herein, FIG objects to this Request as vague, ambiguous, overly
 14 broad and unduly burdensome to the extent that it seeks documents from FIG, a
 15 non-party to the Netflix Litigation. FIG also objects to this Request in that it seeks
 16 documents that are not relevant to any claims or defenses in the Netflix Litigation
 17 and is therefore not proportional to the needs of the Netflix Litigation. FIG further
 18 objects to this Request to the extent it seeks information protected by the attorney-
 19 client privilege, the attorney work-product immunity doctrine, the common interest
 20 privilege, and any other applicable privilege or protection. FIG also objects to this
 21 Request to the extent it seeks third-party documents that FIG is obligated to keep
 22 confidential. FIG objects to this Request to the extent it requires FIG to search for
 23 and produce email in contravention of the applicable ESI Order entered in the
 24 Netflix Litigation.

25 On all of these grounds, FIG objects to producing, and will not produce, any
 26 documents responsive to this Request.

27 **REQUEST NO. 70.**

28 All Documents and Communications relating to the amount of control
 exercised by You in Uniloc 2017 and/or Uniloc.

RESPONSE TO REQUEST NO. 70.

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Request as vague, ambiguous, overly broad and unduly burdensome to the extent that it seeks documents from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG also objects to this Request in that it seeks documents that are not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Request to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Request to the extent it seeks third-party documents that FIG is obligated to keep confidential. FIG objects to this Request to the extent it requires FIG to search for and produce email in contravention of the applicable ESI Order entered in the Netflix Litigation.

On all of these grounds, FIG objects to producing, and will not produce, any documents responsive to this Request.

OBJECTIONS TO DEPOSITION TOPICS**TOPIC NO. 1.**

Your current and former composition, ownership, corporate structure and operation, including without limitation, facts concerning Your creation, funding, and operation; an identification of Your present members, managers, officers, employees, and agents; and the positions, titles, and interests of any identified individuals.

RESPONSE TO TOPIC NO. 1.

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation. FIG also objects to this Topic in that it seeks information

1 that is not relevant to any claims or defenses in the Netflix Litigation and is
 2 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 3 to this Topic to the extent it seeks information protected by the attorney-client
 4 privilege, the attorney work-product immunity doctrine, the common interest
 5 privilege, and any other applicable privilege or protection. FIG also objects to this
 6 Topic to the extent it seeks third-party information that FIG is obligated to keep
 7 confidential.

8 On all of these grounds, FIG objects to producing, and will not produce, any
 9 witnesses to testify regarding this Topic.

10 **TOPIC NO. 2.**

11 Uniloc 2017's current and former composition, ownership, corporate
 12 structure and operation, including without limitation, facts concerning Uniloc
 13 2017's formation, creation, funding, and operation; an identification of Uniloc
 14 2017's present members, managers, officers, employees, and agents; and the
 15 positions, titles, and interests of any identified individuals.

16 **RESPONSE TO TOPIC NO. 2.**

17 In addition to the General Objections, all of which are incorporated by
 18 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 19 broad and unduly burdensome in that it requests information from FIG, a non-party
 20 to the Netflix Litigation, that Netflix can obtain from other sources, including
 21 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 22 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 23 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 24 to the extent it seeks information protected by the attorney-client privilege, the
 25 attorney work-product immunity doctrine, the common interest privilege, and any
 26 other applicable privilege or protection. FIG also objects to this Topic to the extent
 27 it seeks third-party information that FIG is obligated to keep confidential.

28 On all of these grounds, FIG objects to producing, and will not produce, any
 29 witnesses to testify regarding this Topic.

1 TOPIC NO. 3.

2 The business relationship between You and Uniloc, including the date the
3 relationship began and the scope of the relationship.

4 RESPONSE TO TOPIC NO. 3.

5 In addition to the General Objections, all of which are incorporated by
6 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
7 broad and unduly burdensome in that it requests information from FIG, a non-party
8 to the Netflix Litigation, that Netflix can obtain from other sources, including
9 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
10 relevant to any claims or defenses in the Netflix Litigation and is therefore not
11 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
12 to the extent it seeks information protected by the attorney-client privilege, the
13 attorney work-product immunity doctrine, the common interest privilege, and any
14 other applicable privilege or protection. FIG also objects to this Topic to the extent
15 it seeks third-party information that FIG is obligated to keep confidential.

16 On all of these grounds, FIG objects to producing, and will not produce, any
17 witnesses to testify regarding this Topic.

18 TOPIC NO. 4.

19 Agreements entered into between You and Uniloc.

20 RESPONSE TO TOPIC NO. 4.

21 In addition to the General Objections, all of which are incorporated by
22 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
23 broad and unduly burdensome in that it requests information from FIG, a non-party
24 to the Netflix Litigation, that Netflix can obtain from other sources, including
25 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
26 relevant to any claims or defenses in the Netflix Litigation and is therefore not
27 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
28 to the extent it seeks information protected by the attorney-client privilege, the
attorney work-product immunity doctrine, the common interest privilege, and any

1 other applicable privilege or protection. FIG also objects to this Topic to the extent
 2 it seeks third-party information that FIG is obligated to keep confidential.

3 On all of these grounds, FIG objects to producing, and will not produce, any
 4 witnesses to testify regarding this Topic.

5 **TOPIC NO. 5.**

6 The business relationship between You and Uniloc 2017, including the date
 7 the relationship began and the scope of the relationship.

7 **RESPONSE TO TOPIC NO. 5.**

8 In addition to the General Objections, all of which are incorporated by
 9 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 10 broad and unduly burdensome in that it requests information from FIG, a non-party
 11 to the Netflix Litigation, that Netflix can obtain from other sources, including
 12 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 13 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 14 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 15 to the extent it seeks information protected by the attorney-client privilege, the
 16 attorney work-product immunity doctrine, the common interest privilege, and any
 17 other applicable privilege or protection. FIG also objects to this Topic to the extent
 18 it seeks third-party information that FIG is obligated to keep confidential.

19 On all of these grounds, FIG objects to producing, and will not produce, any
 20 witnesses to testify regarding this Topic.

21 **TOPIC NO. 6.**

22 Agreements entered into between You and Uniloc 2017.

23 **RESPONSE TO TOPIC NO. 6.**

24 In addition to the General Objections, all of which are incorporated by
 25 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 26 broad and unduly burdensome in that it requests information from FIG, a non-party
 27 to the Netflix Litigation, that Netflix can obtain from other sources, including
 28 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not

1 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 2 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 3 to the extent it seeks information protected by the attorney-client privilege, the
 4 attorney work-product immunity doctrine, the common interest privilege, and any
 5 other applicable privilege or protection. FIG also objects to this Topic to the extent
 6 it seeks third-party information that FIG is obligated to keep confidential.

7 On all of these grounds, FIG objects to producing, and will not produce, any
 8 witnesses to testify regarding this Topic.

9 **TOPIC NO. 7.**

10 Your revenues, expenses, and profits from patent asserting activities since
 2013.

11 **RESPONSE TO TOPIC NO. 7.**

12 In addition to the General Objections, all of which are incorporated by
 13 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 14 broad and unduly burdensome in that it requests information from FIG, a non-party
 15 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information
 16 that is not relevant to any claims or defenses in the Netflix Litigation and is
 17 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 18 to this Topic to the extent it seeks information protected by the attorney-client
 19 privilege, the attorney work-product immunity doctrine, the common interest
 20 privilege, and any other applicable privilege or protection. FIG also objects to this
 21 Topic to the extent it seeks third-party information that FIG is obligated to keep
 22 confidential.

23 On all of these grounds, FIG objects to producing, and will not produce, any
 24 witnesses to testify regarding this Topic.

25 **TOPIC NO. 8.**

26 Your policies, practices, and customs concerning patent asserting activities
 27 since 2013.

1 **RESPONSE TO TOPIC NO. 8.**

2 In addition to the General Objections, all of which are incorporated by
 3 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 4 broad and unduly burdensome in that it requests information from FIG, a non-party
 5 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information
 6 that is not relevant to any claims or defenses in the Netflix Litigation and is
 7 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 8 to this Topic to the extent it seeks information protected by the attorney-client
 9 privilege, the attorney work-product immunity doctrine, the common interest
 10 privilege, and any other applicable privilege or protection. FIG also objects to this
 11 Topic to the extent it seeks third-party information that FIG is obligated to keep
 12 confidential.

13 On all of these grounds, FIG objects to producing, and will not produce, any
 14 witnesses to testify regarding this Topic.

15 **TOPIC NO. 9.**

16 IPG Electronics 502 Limited's acquisition of patents including the '229
 17 Patent from Electronics and Telecommunications Research Institute (ETRI).

18 **RESPONSE TO TOPIC NO. 9.**

19 In addition to the General Objections, all of which are incorporated by
 20 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 21 broad and unduly burdensome in that it requests information from FIG, a non-party
 22 to the Netflix Litigation, that Netflix can obtain from other sources, including
 23 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 24 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 25 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 26 to the extent it seeks information protected by the attorney-client privilege, the
 27 attorney work-product immunity doctrine, the common interest privilege, and any
 28 other applicable privilege or protection. FIG also objects to this Topic to the extent

1 it seeks third-party information that FIG is obligated to keep confidential.

2 On all of these grounds, FIG objects to producing, and will not produce, any
 3 witnesses to testify regarding this Topic.

4 **TOPIC NO. 10.**

5 Pendrell's acquisition of patents including the '229 Patent from IPG
 6 Electronics 502 Limited.

7 **RESPONSE TO TOPIC NO. 10.**

8 In addition to the General Objections, all of which are incorporated by
 9 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 10 broad and unduly burdensome in that it requests information from FIG, a non-party
 11 to the Netflix Litigation, that Netflix can obtain from other sources, including
 12 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 13 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 14 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 15 to the extent it seeks information protected by the attorney-client privilege, the
 16 attorney work-product immunity doctrine, the common interest privilege, and any
 17 other applicable privilege or protection. FIG also objects to this Topic to the extent
 18 it seeks third-party information that FIG is obligated to keep confidential.

19 On all of these grounds, FIG objects to producing, and will not produce, any
 20 witnesses to testify regarding this Topic.

21 **TOPIC NO. 11.**

22 Uniloc's acquisition of the Pendrell Portfolio patents from Pendrell.

23 **RESPONSE TO TOPIC NO. 11.**

24 In addition to the General Objections, all of which are incorporated by
 25 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 26 broad and unduly burdensome in that it requests information from FIG, a non-party
 27 to the Netflix Litigation, that Netflix can obtain from other sources, including
 28 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 relevant to any claims or defenses in the Netflix Litigation and is therefore not

1 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 2 to the extent it seeks information protected by the attorney-client privilege, the
 3 attorney work-product immunity doctrine, the common interest privilege, and any
 4 other applicable privilege or protection. FIG also objects to this Topic to the extent
 5 it seeks third-party information that FIG is obligated to keep confidential.

6 On all of these grounds, FIG objects to producing, and will not produce, any
 7 witnesses to testify regarding this Topic.

8 **TOPIC NO. 12.**

9 Communications with Uniloc relating to the acquisition of the Pendrell
 10 Portfolio patents.

11 **RESPONSE TO TOPIC NO. 12.**

12 In addition to the General Objections, all of which are incorporated by
 13 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 14 broad and unduly burdensome in that it requests information from FIG, a non-party
 15 to the Netflix Litigation, that Netflix can obtain from other sources, including
 16 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 17 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 18 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 19 to the extent it seeks information protected by the attorney-client privilege, the
 20 attorney work-product immunity doctrine, the common interest privilege, and any
 21 other applicable privilege or protection. FIG also objects to this Topic to the extent
 22 it seeks third-party information that FIG is obligated to keep confidential.

23 On all of these grounds, FIG objects to producing, and will not produce, any
 24 witnesses to testify regarding this Topic.

25 **TOPIC NO. 13.**

26 Communications with Pendrell relating to the acquisition of the Pendrell
 27 Portfolio patents.

28 **RESPONSE TO TOPIC NO. 13.**

29 In addition to the General Objections, all of which are incorporated by

1 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 2 broad and unduly burdensome in that it requests information from FIG, a non-party
 3 to the Netflix Litigation, that Netflix can obtain from other sources, including
 4 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 5 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 6 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 7 to the extent it seeks information protected by the attorney-client privilege, the
 8 attorney work-product immunity doctrine, the common interest privilege, and any
 9 other applicable privilege or protection. FIG also objects to this Topic to the extent
 10 it seeks third-party information that FIG is obligated to keep confidential.

11 On all of these grounds, FIG objects to producing, and will not produce, any
 12 witnesses to testify regarding this Topic.

13 **TOPIC NO. 14.**

14 Agreements and licenses between You and Uniloc concerning any rights to
 15 any of the Pendrell Portfolio patents.

16 **RESPONSE TO TOPIC NO. 14.**

17 In addition to the General Objections, all of which are incorporated by
 18 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 19 broad and unduly burdensome in that it requests information from FIG, a non-party
 20 to the Netflix Litigation, that Netflix can obtain from other sources, including
 21 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 22 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 23 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 24 to the extent it seeks information protected by the attorney-client privilege, the
 25 attorney work-product immunity doctrine, the common interest privilege, and any
 26 other applicable privilege or protection. FIG also objects to this Topic to the extent
 27 it seeks third-party information that FIG is obligated to keep confidential.

28 On all of these grounds, FIG objects to producing, and will not produce, any

1 witnesses to testify regarding this Topic.

2 **TOPIC NO. 15.**

3 Valuations of any of the Pendrell Portfolio patents.

4 **RESPONSE TO TOPIC NO. 15.**

5 In addition to the General Objections, all of which are incorporated by
 6 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 7 broad and unduly burdensome in that it requests information from FIG, a non-party
 8 to the Netflix Litigation, that Netflix can obtain from other sources, including
 9 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 10 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 11 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 12 to the extent it seeks information protected by the attorney-client privilege, the
 13 attorney work-product immunity doctrine, the common interest privilege, and any
 14 other applicable privilege or protection. FIG also objects to this Topic to the extent
 15 it seeks third-party information that FIG is obligated to keep confidential.

16 On all of these grounds, FIG objects to producing, and will not produce, any
 17 witnesses to testify regarding this Topic.

18 **TOPIC NO. 16.**

19 Uniloc's acquisition of the LINQware Portfolio patents from LINQware.

20 **RESPONSE TO TOPIC NO. 16.**

21 In addition to the General Objections, all of which are incorporated by
 22 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 23 broad and unduly burdensome in that it requests information from FIG, a non-party
 24 to the Netflix Litigation, that Netflix can obtain from other sources, including
 25 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 26 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 27 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 28 to the extent it seeks information protected by the attorney-client privilege, the

1 attorney work-product immunity doctrine, the common interest privilege, and any
 2 other applicable privilege or protection. FIG also objects to this Topic to the extent
 3 it seeks third-party information that FIG is obligated to keep confidential.

4 On all of these grounds, FIG objects to producing, and will not produce, any
 5 witnesses to testify regarding this Topic.

6 **TOPIC NO. 17.**

7 Communications with Uniloc relating to the acquisition of the LINQware
 Portfolio patents.

8 **RESPONSE TO TOPIC NO. 17.**

9 In addition to the General Objections, all of which are incorporated by
 10 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 11 broad and unduly burdensome in that it requests information from FIG, a non-party
 12 to the Netflix Litigation, that Netflix can obtain from other sources, including
 13 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 14 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 15 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 16 to the extent it seeks information protected by the attorney-client privilege, the
 17 attorney work-product immunity doctrine, the common interest privilege, and any
 18 other applicable privilege or protection. FIG also objects to this Topic to the extent
 19 it seeks third-party information that FIG is obligated to keep confidential.

20 On all of these grounds, FIG objects to producing, and will not produce, any
 21 witnesses to testify regarding this Topic.

22 **TOPIC NO. 18.**

23 Communications with LINQware relating to the acquisition of the LINQware
 24 Portfolio patents.

25 **RESPONSE TO TOPIC NO. 18.**

26 In addition to the General Objections, all of which are incorporated by
 27 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 28 broad and unduly burdensome in that it requests information from FIG, a non-party

1 to the Netflix Litigation, that Netflix can obtain from other sources, including
 2 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 3 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 4 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 5 to the extent it seeks information protected by the attorney-client privilege, the
 6 attorney work-product immunity doctrine, the common interest privilege, and any
 7 other applicable privilege or protection. FIG also objects to this Topic to the extent
 8 it seeks third-party information that FIG is obligated to keep confidential.

9 On all of these grounds, FIG objects to producing, and will not produce, any
 10 witnesses to testify regarding this Topic.

11 **TOPIC NO. 19.**

12 Agreements and licenses between You and Uniloc concerning any rights to
 13 any of the LINQware Portfolio patents.

14 **RESPONSE TO TOPIC NO. 19.**

15 In addition to the General Objections, all of which are incorporated by
 16 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 17 broad and unduly burdensome in that it requests information from FIG, a non-party
 18 to the Netflix Litigation, that Netflix can obtain from other sources, including
 19 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 20 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 21 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 22 to the extent it seeks information protected by the attorney-client privilege, the
 23 attorney work-product immunity doctrine, the common interest privilege, and any
 24 other applicable privilege or protection. FIG also objects to this Topic to the extent
 25 it seeks third-party information that FIG is obligated to keep confidential.

26 On all of these grounds, FIG objects to producing, and will not produce, any
 27 witnesses to testify regarding this Topic.

28 **TOPIC NO. 20.**

29 Valuations of any of the LINQware Portfolio patents.
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1 **RESPONSE TO TOPIC NO. 20.**

2 In addition to the General Objections, all of which are incorporated by
 3 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 4 broad and unduly burdensome in that it requests information from FIG, a non-party
 5 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information
 6 that is not relevant to any claims or defenses in the Netflix Litigation and is
 7 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 8 to this Topic to the extent it seeks information protected by the attorney-client
 9 privilege, the attorney work-product immunity doctrine, the common interest
 10 privilege, and any other applicable privilege or protection. FIG also objects to this
 11 Topic to the extent it seeks third-party information that FIG is obligated to keep
 12 confidential.

13 On all of these grounds, FIG objects to producing, and will not produce, any
 14 witnesses to testify regarding this Topic.

15 **TOPIC NO. 21.**

16 Uniloc 2017's acquisition of the Uniloc Asserted Patents from Uniloc
 17 Luxembourg S.A.

18 **RESPONSE TO TOPIC NO. 21.**

19 In addition to the General Objections, all of which are incorporated by
 20 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 21 broad and unduly burdensome in that it requests information from FIG, a non-party
 22 to the Netflix Litigation, that Netflix can obtain from other sources, including
 23 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 24 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 25 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 26 to the extent it seeks information protected by the attorney-client privilege, the
 27 attorney work-product immunity doctrine, the common interest privilege, and any
 28 other applicable privilege or protection. FIG also objects to this Topic to the extent

1 it seeks third-party information that FIG is obligated to keep confidential.

2 On all of these grounds, FIG objects to producing, and will not produce, any
 3 witnesses to testify regarding this Topic.

4 **TOPIC NO. 22.**

5 Valuations of any of the Uniloc Asserted Patents or any patent portfolio(s)
 6 that include any of the Uniloc Asserted Patents.

7 **RESPONSE TO TOPIC NO. 22.**

8 In addition to the General Objections, all of which are incorporated by
 9 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 10 broad and unduly burdensome in that it requests information from FIG, a non-party
 11 to the Netflix Litigation, that Netflix can obtain from other sources, including
 12 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 13 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 14 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 15 to the extent it seeks information protected by the attorney-client privilege, the
 16 attorney work-product immunity doctrine, the common interest privilege, and any
 17 other applicable privilege or protection. FIG also objects to this Topic to the extent
 18 it seeks third-party information that FIG is obligated to keep confidential.

19 On all of these grounds, FIG objects to producing, and will not produce, any
 20 witnesses to testify regarding this Topic.

21 **TOPIC NO. 23.**

22 Valuations of any of the Uniloc Asserted Patents or any patent portfolio(s)
 23 that include any of the Uniloc Asserted Patents compared with Your entire patent
 24 portfolio.

25 **RESPONSE TO TOPIC NO. 23.**

26 In addition to the General Objections, all of which are incorporated by
 27 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 28 broad and unduly burdensome in that it requests information from FIG, a non-party
 to the Netflix Litigation, that Netflix can obtain from other sources, including

1 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 2 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 3 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 4 to the extent it seeks information protected by the attorney-client privilege, the
 5 attorney work-product immunity doctrine, the common interest privilege, and any
 6 other applicable privilege or protection. FIG also objects to this Topic to the extent
 7 it seeks third-party information that FIG is obligated to keep confidential.

8 On all of these grounds, FIG objects to producing, and will not produce, any
 9 witnesses to testify regarding this Topic.

10 **TOPIC NO. 24.**

11 License agreements conferring any rights to any of the Uniloc Asserted
 12 Patents or any patent portfolio(s) that include any of the Uniloc Asserted Patents,
 13 including licenses entered into by You, Uniloc, Uniloc 2017, or any prior assignee.

14 **RESPONSE TO TOPIC NO. 24.**

15 In addition to the General Objections, all of which are incorporated by
 16 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 17 broad and unduly burdensome in that it requests information from FIG, a non-party
 18 to the Netflix Litigation, that Netflix can obtain from other sources, including
 19 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 20 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 21 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 22 to the extent it seeks information protected by the attorney-client privilege, the
 23 attorney work-product immunity doctrine, the common interest privilege, and any
 24 other applicable privilege or protection. FIG also objects to this Topic to the extent
 25 it seeks third-party information that FIG is obligated to keep confidential.

26 On all of these grounds, FIG objects to producing, and will not produce, any
 27 witnesses to testify regarding this Topic.

28 **TOPIC NO. 25.**

Agreements conferring any financial, ownership, or security interests to any

1 of the Uniloc Asserted Patents or any patent portfolio(s) that include any of the
 2 Uniloc Asserted Patents.

3 **RESPONSE TO TOPIC NO. 25.**

4 In addition to the General Objections, all of which are incorporated by
 5 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 6 broad and unduly burdensome in that it requests information from FIG, a non-party
 7 to the Netflix Litigation, that Netflix can obtain from other sources, including
 8 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 9 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 10 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 11 to the extent it seeks information protected by the attorney-client privilege, the
 12 attorney work-product immunity doctrine, the common interest privilege, and any
 13 other applicable privilege or protection. FIG also objects to this Topic to the extent
 14 it seeks third-party information that FIG is obligated to keep confidential.

15 On all of these grounds, FIG objects to producing, and will not produce, any
 16 witnesses to testify regarding this Topic.

17 **TOPIC NO. 26.**

18 Communications regarding any of the Uniloc Asserted Patents involving
 You, Uniloc 2017, Uniloc, Pendrell, or LINQware.

19 **RESPONSE TO TOPIC NO. 26.**

20 In addition to the General Objections, all of which are incorporated by
 21 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 22 broad and unduly burdensome in that it requests information from FIG, a non-party
 23 to the Netflix Litigation, that Netflix can obtain from other sources, including
 24 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 25 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 26 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 27 to the extent it seeks information protected by the attorney-client privilege, the
 28

1 attorney work-product immunity doctrine, the common interest privilege, and any
 2 other applicable privilege or protection. FIG also objects to this Topic to the extent
 3 it seeks third-party information that FIG is obligated to keep confidential.

4 On all of these grounds, FIG objects to producing, and will not produce, any
 5 witnesses to testify regarding this Topic.

6 **TOPIC NO. 27.**

7 Communications regarding any of the Uniloc Asserted Patents involving any
 person or entity accused of infringing any of the Uniloc Asserted Patents.

8 **RESPONSE TO TOPIC NO. 27.**

9 In addition to the General Objections, all of which are incorporated by
 10 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 11 broad and unduly burdensome in that it requests information from FIG, a non-party
 12 to the Netflix Litigation, that Netflix can obtain from other sources, including
 13 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 14 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 15 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 16 to the extent it seeks information protected by the attorney-client privilege, the
 17 attorney work-product immunity doctrine, the common interest privilege, and any
 18 other applicable privilege or protection. FIG also objects to this Topic to the extent
 19 it seeks third-party information that FIG is obligated to keep confidential.

20 On all of these grounds, FIG objects to producing, and will not produce, any
 21 witnesses to testify regarding this Topic.

22 **TOPIC NO. 28.**

23 Communications regarding any of the Uniloc Asserted Patents and Netflix.

24 **RESPONSE TO TOPIC NO. 28.**

25 In addition to the General Objections, all of which are incorporated by
 26 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 27 broad and unduly burdensome in that it requests information from FIG, a non-party
 28 to the Netflix Litigation, that Netflix can obtain from other sources, including

1 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 2 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 3 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 4 to the extent it seeks information protected by the attorney-client privilege, the
 5 attorney work-product immunity doctrine, the common interest privilege, and any
 6 other applicable privilege or protection. FIG also objects to this Topic to the extent
 7 it seeks third-party information that FIG is obligated to keep confidential.

8 On all of these grounds, FIG objects to producing, and will not produce, any
 9 witnesses to testify regarding this Topic.

10 **TOPIC NO. 29.**

11 Your and Uniloc 2017's financial condition between 2013 and the present
 12 including but not limited to Your and Uniloc 2017's revenues, profits, and losses.

13 **RESPONSE TO TOPIC NO. 29.**

14 In addition to the General Objections, all of which are incorporated by
 15 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 16 broad and unduly burdensome in that it requests information from FIG, a non-party
 17 to the Netflix Litigation, that Netflix can obtain from other sources, including
 18 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 19 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 20 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 21 to the extent it seeks information protected by the attorney-client privilege, the
 22 attorney work-product immunity doctrine, the common interest privilege, and any
 23 other applicable privilege or protection. FIG also objects to this Topic to the extent
 24 it seeks third-party information that FIG is obligated to keep confidential.

25 On all of these grounds, FIG objects to producing, and will not produce, any
 26 witnesses to testify regarding this Topic.

27 **TOPIC NO. 30.**

28 Any ability by anyone at any time to grant a license, release, or covenant
 under any of the Uniloc Asserted Patents.

1 **RESPONSE TO TOPIC NO. 30.**

2 In addition to the General Objections, all of which are incorporated by
 3 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 4 broad and unduly burdensome in that it requests information from FIG, a non-party
 5 to the Netflix Litigation, that Netflix can obtain from other sources, including
 6 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 7 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 8 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 9 to the extent it seeks information protected by the attorney-client privilege, the
 10 attorney work-product immunity doctrine, the common interest privilege, and any
 11 other applicable privilege or protection. FIG also objects to this Topic to the extent
 12 it seeks third-party information that FIG is obligated to keep confidential.

13 On all of these grounds, FIG objects to producing, and will not produce, any
 14 witnesses to testify regarding this Topic.

15 **TOPIC NO. 31.**

16 Legal proceedings in which any of the Uniloc Asserted Patents is asserted for
 17 infringement.

18 **RESPONSE TO TOPIC NO. 31.**

19 In addition to the General Objections, all of which are incorporated by
 20 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 21 broad and unduly burdensome in that it requests information from FIG, a non-party
 22 to the Netflix Litigation, that Netflix can obtain from other sources, including
 23 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 24 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 25 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 26 to the extent it seeks information protected by the attorney-client privilege, the
 27 attorney work-product immunity doctrine, the common interest privilege, and any
 28 other applicable privilege or protection. FIG also objects to this Topic to the extent

1 it seeks third-party information that FIG is obligated to keep confidential.

2 On all of these grounds, FIG objects to producing, and will not produce, any
3 witnesses to testify regarding this Topic.

4 **TOPIC NO. 32.**

5 Analysis of revenue projections and return on investment of any of the
6 Uniloc Asserted Patents or any patent portfolio(s) that include any of the Uniloc
7 Asserted Patents.

8 **RESPONSE TO TOPIC NO. 32.**

9 In addition to the General Objections, all of which are incorporated by
10 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
11 broad and unduly burdensome in that it requests information from FIG, a non-party
12 to the Netflix Litigation, that Netflix can obtain from other sources, including
13 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
14 relevant to any claims or defenses in the Netflix Litigation and is therefore not
15 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
16 to the extent it seeks information protected by the attorney-client privilege, the
17 attorney work-product immunity doctrine, the common interest privilege, and any
18 other applicable privilege or protection. FIG also objects to this Topic to the extent
19 it seeks third-party information that FIG is obligated to keep confidential.

20 On all of these grounds, FIG objects to producing, and will not produce, any
21 witnesses to testify regarding this Topic.

22 **TOPIC NO. 33.**

23 Analysis of assertion for infringement of any of the Uniloc Asserted Patents
24 or any patent portfolio(s) that include any of the Uniloc Asserted Patents.

25 **RESPONSE TO TOPIC NO. 33.**

26 In addition to the General Objections, all of which are incorporated by
27 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
28 broad and unduly burdensome in that it requests information from FIG, a non-party
to the Netflix Litigation, that Netflix can obtain from other sources, including

1 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 2 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 3 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 4 to the extent it seeks information protected by the attorney-client privilege, the
 5 attorney work-product immunity doctrine, the common interest privilege, and any
 6 other applicable privilege or protection. FIG also objects to this Topic to the extent
 7 it seeks third-party information that FIG is obligated to keep confidential.

8 On all of these grounds, FIG objects to producing, and will not produce, any
 9 witnesses to testify regarding this Topic.

10 **TOPIC NO. 34.**

11 Financial interest You have in any settlement, judgment, damages award, or
 12 other relief that results from assertion of the Uniloc Asserted Patents or any patent
 13 portfolio(s) that include any of the Uniloc Asserted Patents.

14 **RESPONSE TO TOPIC NO. 34.**

15 In addition to the General Objections, all of which are incorporated by
 16 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 17 broad and unduly burdensome in that it requests information from FIG, a non-party
 18 to the Netflix Litigation, that Netflix can obtain from other sources, including
 19 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 20 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 21 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 22 to the extent it seeks information protected by the attorney-client privilege, the
 23 attorney work-product immunity doctrine, the common interest privilege, and any
 24 other applicable privilege or protection. FIG also objects to this Topic to the extent
 25 it seeks third-party information that FIG is obligated to keep confidential.

26 On all of these grounds, FIG objects to producing, and will not produce, any
 27 witnesses to testify regarding this Topic.

28 **TOPIC NO. 35.**

29 Communications relating to Netflix's alleged infringement of any of the

1 Uniloc Asserted Patents.

2 **RESPONSE TO TOPIC NO. 35.**

3 In addition to the General Objections, all of which are incorporated by
 4 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 5 broad and unduly burdensome in that it requests information from FIG, a non-party
 6 to the Netflix Litigation, that Netflix can obtain from other sources, including
 7 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 8 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 9 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 10 to the extent it seeks information protected by the attorney-client privilege, the
 11 attorney work-product immunity doctrine, the common interest privilege, and any
 12 other applicable privilege or protection. FIG also objects to this Topic to the extent
 13 it seeks third-party information that FIG is obligated to keep confidential.

14 On all of these grounds, FIG objects to producing, and will not produce, any
 15 witnesses to testify regarding this Topic.

16 **TOPIC NO. 36.**

17 Communications relating to the decision to initiate this Litigation against
 18 Netflix.

19 **RESPONSE TO TOPIC NO. 36.**

20 In addition to the General Objections, all of which are incorporated by
 21 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 22 broad and unduly burdensome in that it requests information from FIG, a non-party
 23 to the Netflix Litigation, that Netflix can obtain from other sources, including
 24 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 25 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 26 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 27 to the extent it seeks information protected by the attorney-client privilege, the
 28 attorney work-product immunity doctrine, the common interest privilege, and any

1 other applicable privilege or protection. FIG also objects to this Topic to the extent
 2 it seeks third-party information that FIG is obligated to keep confidential.

3 On all of these grounds, FIG objects to producing, and will not produce, any
 4 witnesses to testify regarding this Topic.

5 **TOPIC NO. 37.**

6 Valuation of the assertion of the Uniloc Asserted Patents against Netflix.

7 **RESPONSE TO TOPIC NO. 37.**

8 In addition to the General Objections, all of which are incorporated by
 9 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 10 broad and unduly burdensome in that it requests information from FIG, a non-party
 11 to the Netflix Litigation, that Netflix can obtain from other sources, including
 12 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 13 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 14 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 15 to the extent it seeks information protected by the attorney-client privilege, the
 16 attorney work-product immunity doctrine, the common interest privilege, and any
 17 other applicable privilege or protection. FIG also objects to this Topic to the extent
 18 it seeks third-party information that FIG is obligated to keep confidential.

19 On all of these grounds, FIG objects to producing, and will not produce, any
 20 witnesses to testify regarding this Topic.

21 **TOPIC NO. 38.**

22 Your funding of this Litigation against Netflix.

23 **RESPONSE TO TOPIC NO. 38.**

24 In addition to the General Objections, all of which are incorporated by
 25 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 26 broad and unduly burdensome in that it requests information from FIG, a non-party
 27 to the Netflix Litigation, that Netflix can obtain from other sources, including
 28 Uniloc 2017. FIG objects to the phrase “funding of this Litigation” as vague and

1 ambiguous. FIG also objects to this Topic in that it seeks information that is not
 2 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 3 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 4 to the extent it seeks information protected by the attorney-client privilege, the
 5 attorney work-product immunity doctrine, the common interest privilege, and any
 6 other applicable privilege or protection. FIG also objects to this Topic to the extent
 7 it seeks third-party information that FIG is obligated to keep confidential.

8 On all of these grounds, FIG objects to producing, and will not produce, any
 9 witnesses to testify regarding this Topic.

10 **TOPIC NO. 39.**

11 Your financial interest in the outcome of this Litigation against Netflix.

12 **RESPONSE TO TOPIC NO. 39.**

13 In addition to the General Objections, all of which are incorporated by
 14 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 15 broad and unduly burdensome in that it requests information from FIG, a non-party
 16 to the Netflix Litigation, that Netflix can obtain from other sources, including
 17 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 18 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 19 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 20 to the extent it seeks information protected by the attorney-client privilege, the
 21 attorney work-product immunity doctrine, the common interest privilege, and any
 22 other applicable privilege or protection. FIG also objects to this Topic to the extent
 23 it seeks third-party information that FIG is obligated to keep confidential.

24 On all of these grounds, FIG objects to producing, and will not produce, any
 25 witnesses to testify regarding this Topic.

26 **TOPIC NO. 40.**

27 Your financial gains, profits, or revenues that may be attributed to the '229
 Patent.

RESPONSE TO TOPIC NO. 40.

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG objects to the phrase “financial gains, profits, or revenues” as vague and ambiguous. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects to this Topic to the extent it seeks information protected by the attorney-client privilege, the attorney work-product immunity doctrine, the common interest privilege, and any other applicable privilege or protection. FIG also objects to this Topic to the extent it seeks third-party information that FIG is obligated to keep confidential.

On all of these grounds, FIG objects to producing, and will not produce, any witnesses to testify regarding this Topic.

TOPIC NO. 41.

Your financial gains, profits, or revenues that may be attributed to the ’609 Patent.

RESPONSE TO TOPIC NO. 41.

In addition to the General Objections, all of which are incorporated by specific reference herein, FIG objects to this Topic as vague, ambiguous, overly broad and unduly burdensome in that it requests information from FIG, a non-party to the Netflix Litigation, that Netflix can obtain from other sources, including Uniloc 2017. FIG objects to the phrase “financial gains, profits, or revenues” as vague and ambiguous. FIG also objects to this Topic in that it seeks information that is not relevant to any claims or defenses in the Netflix Litigation and is therefore not proportional to the needs of the Netflix Litigation. FIG further objects

1 to this Topic to the extent it seeks information protected by the attorney-client
 2 privilege, the attorney work-product immunity doctrine, the common interest
 3 privilege, and any other applicable privilege or protection. FIG also objects to this
 4 Topic to the extent it seeks third-party information that FIG is obligated to keep
 5 confidential.

6 On all of these grounds, FIG objects to producing, and will not produce, any
 7 witnesses to testify regarding this Topic.

8 **TOPIC NO. 42.**

9 Your financial gains, profits, or revenues that may be attributed to the '273
 Patent.

10 **RESPONSE TO TOPIC NO. 42.**

11 In addition to the General Objections, all of which are incorporated by
 12 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 13 broad and unduly burdensome in that it requests information from FIG, a non-party
 14 to the Netflix Litigation, that Netflix can obtain from other sources, including
 15 Uniloc 2017. FIG objects to the phrase "financial gains, profits, or revenues" as
 16 vague and ambiguous. FIG also objects to this Topic in that it seeks information
 17 that is not relevant to any claims or defenses in the Netflix Litigation and is
 18 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 19 to this Topic to the extent it seeks information protected by the attorney-client
 20 privilege, the attorney work-product immunity doctrine, the common interest
 21 privilege, and any other applicable privilege or protection. FIG also objects to this
 22 Topic to the extent it seeks third-party information that FIG is obligated to keep
 23 confidential.

24 On all of these grounds, FIG objects to producing, and will not produce, any
 25 witnesses to testify regarding this Topic.

26 **TOPIC NO. 43.**

27 Your offers, requests, discussion, and negotiations to provide a license to the
 28 '229 Patent.

1 **RESPONSE TO TOPIC NO. 43.**

2 In addition to the General Objections, all of which are incorporated by
 3 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 4 broad and unduly burdensome in that it requests information from FIG, a non-party
 5 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information
 6 that is not relevant to any claims or defenses in the Netflix Litigation and is
 7 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 8 to this Topic to the extent it seeks information protected by the attorney-client
 9 privilege, the attorney work-product immunity doctrine, the common interest
 10 privilege, and any other applicable privilege or protection. FIG also objects to this
 11 Topic to the extent it seeks third-party information that FIG is obligated to keep
 12 confidential.

13 On all of these grounds, FIG objects to producing, and will not produce, any
 14 witnesses to testify regarding this Topic.

15 **TOPIC NO. 44.**

16 Your offers, requests, discussion, and negotiations to provide a license to the
 17 '609 Patent.

18 **RESPONSE TO TOPIC NO. 44.**

19 In addition to the General Objections, all of which are incorporated by
 20 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 21 broad and unduly burdensome in that it requests information from FIG, a non-party
 22 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information
 23 that is not relevant to any claims or defenses in the Netflix Litigation and is
 24 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 25 to this Topic to the extent it seeks information protected by the attorney-client
 26 privilege, the attorney work-product immunity doctrine, the common interest
 27 privilege, and any other applicable privilege or protection. FIG also objects to this
 28 Topic to the extent it seeks third-party information that FIG is obligated to keep

1 confidential.

2 On all of these grounds, FIG objects to producing, and will not produce, any
 3 witnesses to testify regarding this Topic.

4 **TOPIC NO. 45.**

5 Your offers, requests, discussion, and negotiations to provide a license to the
 '273 Patent.

6 **RESPONSE TO TOPIC NO. 45.**

7 In addition to the General Objections, all of which are incorporated by
 8 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 9 broad and unduly burdensome in that it requests information from FIG, a non-party
 10 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information
 11 that is not relevant to any claims or defenses in the Netflix Litigation and is
 12 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 13 to this Topic to the extent it seeks information protected by the attorney-client
 14 privilege, the attorney work-product immunity doctrine, the common interest
 15 privilege, and any other applicable privilege or protection. FIG also objects to this
 16 Topic to the extent it seeks third-party information that FIG is obligated to keep
 17 confidential.

18 On all of these grounds, FIG objects to producing, and will not produce, any
 19 witnesses to testify regarding this Topic.

20 **TOPIC NO. 46.**

21 The May 3, 2018 Payoff and Termination Agreement (produced at
 22 UNILOC_0004017).

23 **RESPONSE TO TOPIC NO. 46.**

24 In addition to the General Objections, all of which are incorporated by
 25 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 26 broad and unduly burdensome in that it requests information from FIG, a non-party
 27 to the Netflix Litigation, that Netflix can obtain from other sources, including
 28 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not

1 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 2 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 3 to the extent it seeks information protected by the attorney-client privilege, the
 4 attorney work-product immunity doctrine, the common interest privilege, and any
 5 other applicable privilege or protection. FIG also objects to this Topic to the extent
 6 it seeks third-party information that FIG is obligated to keep confidential.

7 On all of these grounds, FIG objects to producing, and will not produce, any
 8 witnesses to testify regarding this Topic.

9 **TOPIC NO. 47.**

10 The relative value of any of the Uniloc Asserted Patents in relation to other
 11 patents, including but not limited to relative value of any of the Uniloc Asserted
 12 Patents compared to other patents that were acquired as part of the same portfolio
 13 or other patents licensed as part of the same portfolio.

14 **RESPONSE TO TOPIC NO. 47.**

15 In addition to the General Objections, all of which are incorporated by
 16 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 17 broad and unduly burdensome in that it requests information from FIG, a non-party
 18 to the Netflix Litigation, that Netflix can obtain from other sources, including
 19 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 20 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 21 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 22 to the extent it seeks information protected by the attorney-client privilege, the
 23 attorney work-product immunity doctrine, the common interest privilege, and any
 24 other applicable privilege or protection. FIG also objects to this Topic to the extent
 25 it seeks third-party information that FIG is obligated to keep confidential.

26 On all of these grounds, FIG objects to producing, and will not produce, any
 27 witnesses to testify regarding this Topic.

28 **TOPIC NO. 48.**

29 Any business plan that references this Litigation.

1 **RESPONSE TO TOPIC NO. 48.**

2 In addition to the General Objections, all of which are incorporated by
 3 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 4 broad and unduly burdensome in that it requests information from FIG, a non-party
 5 to the Netflix Litigation, that Netflix can obtain from other sources, including
 6 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 7 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 8 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 9 to the extent it seeks information protected by the attorney-client privilege, the
 10 attorney work-product immunity doctrine, the common interest privilege, and any
 11 other applicable privilege or protection. FIG also objects to this Topic to the extent
 12 it seeks third-party information that FIG is obligated to keep confidential.

13 On all of these grounds, FIG objects to producing, and will not produce, any
 14 witnesses to testify regarding this Topic.

15 **TOPIC NO. 49.**

16 Any business plan that references Netflix.

17 **RESPONSE TO TOPIC NO. 49.**

18 In addition to the General Objections, all of which are incorporated by
 19 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 20 broad and unduly burdensome in that it requests information from FIG, a non-party
 21 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information
 22 that is not relevant to any claims or defenses in the Netflix Litigation and is
 23 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 24 to this Topic to the extent it seeks information protected by the attorney-client
 25 privilege, the attorney work-product immunity doctrine, the common interest
 26 privilege, and any other applicable privilege or protection. FIG also objects to this
 27 Topic to the extent it seeks third-party information that FIG is obligated to keep
 28 confidential.

1 On all of these grounds, FIG objects to producing, and will not produce, any
 2 witnesses to testify regarding this Topic.

3 **TOPIC NO. 50.**

4 Any business plan that references the Uniloc Asserted Patents.

5 **RESPONSE TO TOPIC NO. 50.**

6 In addition to the General Objections, all of which are incorporated by
 7 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 8 broad and unduly burdensome in that it requests information from FIG, a non-party
 9 to the Netflix Litigation, that Netflix can obtain from other sources, including
 10 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 11 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 12 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 13 to the extent it seeks information protected by the attorney-client privilege, the
 14 attorney work-product immunity doctrine, the common interest privilege, and any
 15 other applicable privilege or protection. FIG also objects to this Topic to the extent
 16 it seeks third-party information that FIG is obligated to keep confidential.

17 On all of these grounds, FIG objects to producing, and will not produce, any
 18 witnesses to testify regarding this Topic.

19 **TOPIC NO. 51.**

20 Any business plan that references the Pendrell Portfolio or any of the assets
 therein.

21 **RESPONSE TO TOPIC NO. 51.**

22 In addition to the General Objections, all of which are incorporated by
 23 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 24 broad and unduly burdensome in that it requests information from FIG, a non-party
 25 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information
 26 that is not relevant to any claims or defenses in the Netflix Litigation and is
 27 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 28 to this Topic to the extent it seeks information protected by the attorney-client

1 privilege, the attorney work-product immunity doctrine, the common interest
 2 privilege, and any other applicable privilege or protection. FIG also objects to this
 3 Topic to the extent it seeks third-party information that FIG is obligated to keep
 4 confidential.

5 On all of these grounds, FIG objects to producing, and will not produce, any
 6 witnesses to testify regarding this Topic.

7 **TOPIC NO. 52.**

8 Any business plan that references the LINQware Portfolio or any of the
 assets therein.

9 **RESPONSE TO TOPIC NO. 52.**

10 In addition to the General Objections, all of which are incorporated by
 11 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 12 broad and unduly burdensome in that it requests information from FIG, a non-party
 13 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information
 14 that is not relevant to any claims or defenses in the Netflix Litigation and is
 15 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 16 to this Topic to the extent it seeks information protected by the attorney-client
 17 privilege, the attorney work-product immunity doctrine, the common interest
 18 privilege, and any other applicable privilege or protection. FIG also objects to this
 19 Topic to the extent it seeks third-party information that FIG is obligated to keep
 20 confidential.

21 On all of these grounds, FIG objects to producing, and will not produce, any
 22 witnesses to testify regarding this Topic.

23 **TOPIC NO. 53.**

24 Any communication to investors that references this Litigation.

25 **RESPONSE TO TOPIC NO. 53.**

26 In addition to the General Objections, all of which are incorporated by
 27 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 28 broad and unduly burdensome in that it requests information from FIG, a non-party

1 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information
 2 that is not relevant to any claims or defenses in the Netflix Litigation and is
 3 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 4 to this Topic to the extent it seeks information protected by the attorney-client
 5 privilege, the attorney work-product immunity doctrine, the common interest
 6 privilege, and any other applicable privilege or protection. FIG also objects to this
 7 Topic to the extent it seeks third-party information that FIG is obligated to keep
 8 confidential.

9 On all of these grounds, FIG objects to producing, and will not produce, any
 10 witnesses to testify regarding this Topic.

11 **TOPIC NO. 54.**

12 Any communication to investors that references Netflix.

13 **RESPONSE TO TOPIC NO. 54.**

14 In addition to the General Objections, all of which are incorporated by
 15 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 16 broad and unduly burdensome in that it requests information from FIG, a non-party
 17 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information
 18 that is not relevant to any claims or defenses in the Netflix Litigation and is
 19 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 20 to this Topic to the extent it seeks information protected by the attorney-client
 21 privilege, the attorney work-product immunity doctrine, the common interest
 22 privilege, and any other applicable privilege or protection. FIG also objects to this
 23 Topic to the extent it seeks third-party information that FIG is obligated to keep
 24 confidential.

25 On all of these grounds, FIG objects to producing, and will not produce, any
 26 witnesses to testify regarding this Topic.

27 **TOPIC NO. 55.**

28 Any communication to investors that references the Uniloc Asserted Patents.

1 **RESPONSE TO TOPIC NO. 55.**

2 In addition to the General Objections, all of which are incorporated by
 3 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 4 broad and unduly burdensome in that it requests information from FIG, a non-party
 5 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information
 6 that is not relevant to any claims or defenses in the Netflix Litigation and is
 7 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 8 to this Topic to the extent it seeks information protected by the attorney-client
 9 privilege, the attorney work-product immunity doctrine, the common interest
 10 privilege, and any other applicable privilege or protection. FIG also objects to this
 11 Topic to the extent it seeks third-party information that FIG is obligated to keep
 12 confidential.

13 On all of these grounds, FIG objects to producing, and will not produce, any
 14 witnesses to testify regarding this Topic.

15 **TOPIC NO. 56.**

16 Any communication to investors that references the Pendrell Portfolio or any
 17 of the assets therein.

18 **RESPONSE TO TOPIC NO. 56.**

19 In addition to the General Objections, all of which are incorporated by
 20 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 21 broad and unduly burdensome in that it requests information from FIG, a non-party
 22 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information
 23 that is not relevant to any claims or defenses in the Netflix Litigation and is
 24 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 25 to this Topic to the extent it seeks information protected by the attorney-client
 26 privilege, the attorney work-product immunity doctrine, the common interest
 27 privilege, and any other applicable privilege or protection. FIG also objects to this
 28 Topic to the extent it seeks third-party information that FIG is obligated to keep

1 confidential.

2 On all of these grounds, FIG objects to producing, and will not produce, any
 3 witnesses to testify regarding this Topic.

4 **TOPIC NO. 57.**

5 Any communication to investors that references the LINQware Portfolio or
 6 any of the assets therein.

7 **RESPONSE TO TOPIC NO. 57.**

8 In addition to the General Objections, all of which are incorporated by
 9 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 10 broad and unduly burdensome in that it requests information from FIG, a non-party
 11 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information
 12 that is not relevant to any claims or defenses in the Netflix Litigation and is
 13 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 14 to this Topic to the extent it seeks information protected by the attorney-client
 15 privilege, the attorney work-product immunity doctrine, the common interest
 16 privilege, and any other applicable privilege or protection. FIG also objects to this
 17 Topic to the extent it seeks third-party information that FIG is obligated to keep
 18 confidential.

19 On all of these grounds, FIG objects to producing, and will not produce, any
 20 witnesses to testify regarding this Topic.

21 **TOPIC NO. 58.**

22 Any communication with or report to Softbank Corp. regarding this
 23 Litigation.

24 **RESPONSE TO TOPIC NO. 58.**

25 In addition to the General Objections, all of which are incorporated by
 26 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 27 broad and unduly burdensome in that it requests information from FIG, a non-party
 28 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information
 that is not relevant to any claims or defenses in the Netflix Litigation and is

1 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 2 to this Topic to the extent it seeks information protected by the attorney-client
 3 privilege, the attorney work-product immunity doctrine, the common interest
 4 privilege, and any other applicable privilege or protection. FIG also objects to this
 5 Topic to the extent it seeks third-party information that FIG is obligated to keep
 6 confidential.

7 On all of these grounds, FIG objects to producing, and will not produce, any
 8 witnesses to testify regarding this Topic.

9 **TOPIC NO. 59.**

10 Any communication with or report to Softbank Corp. regarding Netflix.

11 **RESPONSE TO TOPIC NO. 59.**

12 In addition to the General Objections, all of which are incorporated by
 13 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 14 broad and unduly burdensome in that it requests information from FIG, a non-party
 15 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information
 16 that is not relevant to any claims or defenses in the Netflix Litigation and is
 17 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 18 to this Topic to the extent it seeks information protected by the attorney-client
 19 privilege, the attorney work-product immunity doctrine, the common interest
 20 privilege, and any other applicable privilege or protection. FIG also objects to this
 21 Topic to the extent it seeks third-party information that FIG is obligated to keep
 22 confidential.

23 On all of these grounds, FIG objects to producing, and will not produce, any
 24 witnesses to testify regarding this Topic.

25 **TOPIC NO. 60.**

26 Any communication with or report to Softbank Corp. regarding the Uniloc
 Asserted Patents.

27 **RESPONSE TO TOPIC NO. 60.**

28 In addition to the General Objections, all of which are incorporated by

1 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 2 broad and unduly burdensome in that it requests information from FIG, a non-party
 3 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information
 4 that is not relevant to any claims or defenses in the Netflix Litigation and is
 5 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 6 to this Topic to the extent it seeks information protected by the attorney-client
 7 privilege, the attorney work-product immunity doctrine, the common interest
 8 privilege, and any other applicable privilege or protection. FIG also objects to this
 9 Topic to the extent it seeks third-party information that FIG is obligated to keep
 10 confidential.

11 On all of these grounds, FIG objects to producing, and will not produce, any
 12 witnesses to testify regarding this Topic.

13 **TOPIC NO. 61.**

14 Any communication with or report to Softbank Corp. regarding the Pendrell
 15 Portfolio or any of the assets therein.

16 **RESPONSE TO TOPIC NO. 61.**

17 In addition to the General Objections, all of which are incorporated by
 18 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 19 broad and unduly burdensome in that it requests information from FIG, a non-party
 20 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information
 21 that is not relevant to any claims or defenses in the Netflix Litigation and is
 22 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 23 to this Topic to the extent it seeks information protected by the attorney-client
 24 privilege, the attorney work-product immunity doctrine, the common interest
 25 privilege, and any other applicable privilege or protection. FIG also objects to this
 26 Topic to the extent it seeks third-party information that FIG is obligated to keep
 27 confidential.

28 On all of these grounds, FIG objects to producing, and will not produce, any

1 witnesses to testify regarding this Topic.

2 **TOPIC NO. 62.**

3 Any communication with or report to Softbank Corp. regarding the
4 LINQware Portfolio or any of the assets therein.

5 **RESPONSE TO TOPIC NO. 62.**

6 In addition to the General Objections, all of which are incorporated by
7 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
8 broad and unduly burdensome in that it requests information from FIG, a non-party
9 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information
10 that is not relevant to any claims or defenses in the Netflix Litigation and is
11 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
12 to this Topic to the extent it seeks information protected by the attorney-client
13 privilege, the attorney work-product immunity doctrine, the common interest
14 privilege, and any other applicable privilege or protection. FIG also objects to this
15 Topic to the extent it seeks third-party information that FIG is obligated to keep
16 confidential.

17 On all of these grounds, FIG objects to producing, and will not produce, any
18 witnesses to testify regarding this Topic.

19 **TOPIC NO. 63.**

20 Any forecasts and/or outlook on any possible results related to this Litigation,
21 Netflix, the Uniloc Asserted Patents, the Pendrell Portfolio or any of the assets
22 therein, and/or LINQware Portfolio or any of the assets therein.

23 **RESPONSE TO TOPIC NO. 63.**

24 In addition to the General Objections, all of which are incorporated by
25 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
26 broad and unduly burdensome in that it requests information from FIG, a non-party
27 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information
28 that is not relevant to any claims or defenses in the Netflix Litigation and is
 therefore not proportional to the needs of the Netflix Litigation. FIG further objects

1 to this Topic to the extent it seeks information protected by the attorney-client
 2 privilege, the attorney work-product immunity doctrine, the common interest
 3 privilege, and any other applicable privilege or protection. FIG also objects to this
 4 Topic to the extent it seeks third-party information that FIG is obligated to keep
 5 confidential.

6 On all of these grounds, FIG objects to producing, and will not produce, any
 7 witnesses to testify regarding this Topic.

8 **TOPIC NO. 64.**

9 Communications relating to patent assertion strategy involving any of the
 10 Uniloc Asserted Patents or any patent portfolio(s) that include any of the Uniloc
 Asserted Patents.

11 **RESPONSE TO TOPIC NO. 64.**

12 In addition to the General Objections, all of which are incorporated by
 13 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 14 broad and unduly burdensome in that it requests information from FIG, a non-party
 15 to the Netflix Litigation, that Netflix can obtain from other sources, including
 16 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not
 17 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 18 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 19 to the extent it seeks information protected by the attorney-client privilege, the
 20 attorney work-product immunity doctrine, the common interest privilege, and any
 21 other applicable privilege or protection. FIG also objects to this Topic to the extent
 22 it seeks third-party information that FIG is obligated to keep confidential.

23 On all of these grounds, FIG objects to producing, and will not produce, any
 24 witnesses to testify regarding this Topic.

25 **TOPIC NO. 65.**

26 Communications relating to Softbank Corp.'s decision to invest in You,
 27 including but not limited to any valuation conducted by Softbank Corp. of the
 28 Uniloc Asserted Patents or any patent portfolio(s) that include any of the Uniloc
 Asserted Patents.

1 **RESPONSE TO TOPIC NO. 65.**

2 In addition to the General Objections, all of which are incorporated by
 3 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 4 broad and unduly burdensome in that it requests information from FIG, a non-party
 5 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information
 6 that is not relevant to any claims or defenses in the Netflix Litigation and is
 7 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 8 to this Topic to the extent it seeks information protected by the attorney-client
 9 privilege, the attorney work-product immunity doctrine, the common interest
 10 privilege, and any other applicable privilege or protection. FIG also objects to this
 11 Topic to the extent it seeks third-party information that FIG is obligated to keep
 12 confidential.

13 On all of these grounds, FIG objects to producing, and will not produce, any
 14 witnesses to testify regarding this Topic.

15 **TOPIC NO. 66.**

16 Communications relating to any agreement involving Your investment in or
 17 ownership of any patent assertion entity and the reasons for any subsequent change
 18 or modification in the terms of any such agreement.

19 **RESPONSE TO TOPIC NO. 66.**

20 In addition to the General Objections, all of which are incorporated by
 21 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 22 broad and unduly burdensome in that it requests information from FIG, a non-party
 23 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information
 24 that is not relevant to any claims or defenses in the Netflix Litigation and is
 25 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 26 to this Topic to the extent it seeks information protected by the attorney-client
 27 privilege, the attorney work-product immunity doctrine, the common interest
 28 privilege, and any other applicable privilege or protection. FIG also objects to this
 Topic to the extent it seeks third-party information that FIG is obligated to keep

1 confidential.

2 On all of these grounds, FIG objects to producing, and will not produce, any
 3 witnesses to testify regarding this Topic.

4 **TOPIC NO. 67.**

5 Communications relating to Your strategy to drive up the costs of defense in
 6 any patent assertion campaigns in which You are a party.

7 **RESPONSE TO TOPIC NO. 67.**

8 In addition to the General Objections, all of which are incorporated by
 9 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 10 broad and unduly burdensome in that it requests information from FIG, a non-party
 11 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information
 12 that is not relevant to any claims or defenses in the Netflix Litigation and is
 13 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 14 to this Topic to the extent it seeks information protected by the attorney-client
 15 privilege, the attorney work-product immunity doctrine, the common interest
 16 privilege, and any other applicable privilege or protection. FIG also objects to this
 17 Topic to the extent it seeks third-party information that FIG is obligated to keep
 18 confidential.

19 On all of these grounds, FIG objects to producing, and will not produce, any
 20 witnesses to testify regarding this Topic.

21 **TOPIC NO. 68.**

22 Communications relating to the amount of control exercised by You in
 23 Uniloc 2017 and/or Uniloc.

24 **RESPONSE TO TOPIC NO. 68.**

25 In addition to the General Objections, all of which are incorporated by
 26 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 27 broad and unduly burdensome in that it requests information from FIG, a non-party
 28 to the Netflix Litigation, that Netflix can obtain from other sources, including
 Uniloc 2017. FIG also objects to this Topic in that it seeks information that is not

1 relevant to any claims or defenses in the Netflix Litigation and is therefore not
 2 proportional to the needs of the Netflix Litigation. FIG further objects to this Topic
 3 to the extent it seeks information protected by the attorney-client privilege, the
 4 attorney work-product immunity doctrine, the common interest privilege, and any
 5 other applicable privilege or protection. FIG also objects to this Topic to the extent
 6 it seeks third-party information that FIG is obligated to keep confidential.

7 On all of these grounds, FIG objects to producing, and will not produce, any
 8 witnesses to testify regarding this Topic.

9 **TOPIC NO. 69.**

10 The identity and location of all Persons with knowledge regarding each of the
 above deposition topics.

11 **RESPONSE TO TOPIC NO. 69.**

12 In addition to the General Objections, all of which are incorporated by
 13 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 14 broad and unduly burdensome in that it requests information from FIG, a non-party
 15 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information
 16 that is not relevant to any claims or defenses in the Netflix Litigation and is
 17 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 18 to this Topic to the extent it seeks information protected by the attorney-client
 19 privilege, the attorney work-product immunity doctrine, the common interest
 20 privilege, and any other applicable privilege or protection. FIG also objects to this
 21 Topic to the extent it seeks third-party information that FIG is obligated to keep
 22 confidential.

23 On all of these grounds, FIG objects to producing, and will not produce, any
 24 witnesses to testify regarding this Topic.

25 **TOPIC NO. 70.**

26 The identity, location, and content of all Documents relating to each of the
 27 above deposition topics.

1 **RESPONSE TO TOPIC NO. 70.**

2 In addition to the General Objections, all of which are incorporated by
 3 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 4 broad and unduly burdensome in that it requests information from FIG, a non-party
 5 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information
 6 that is not relevant to any claims or defenses in the Netflix Litigation and is
 7 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 8 to this Topic to the extent it seeks information protected by the attorney-client
 9 privilege, the attorney work-product immunity doctrine, the common interest
 10 privilege, and any other applicable privilege or protection. FIG also objects to this
 11 Topic to the extent it seeks third-party information that FIG is obligated to keep
 12 confidential.

13 On all of these grounds, FIG objects to producing, and will not produce, any
 14 witnesses to testify regarding this Topic.

15 **TOPIC NO. 71.**

16 The identity, location, and content of Documents You produced and
 17 Documents You identified but did not produce in response to the subpoena and
 accompanying Exhibit A.

18 **RESPONSE TO TOPIC NO. 71.**

19 In addition to the General Objections, all of which are incorporated by
 20 specific reference herein, FIG objects to this Topic as vague, ambiguous, overly
 21 broad and unduly burdensome in that it requests information from FIG, a non-party
 22 to the Netflix Litigation. FIG also objects to this Topic in that it seeks information
 23 that is not relevant to any claims or defenses in the Netflix Litigation and is
 24 therefore not proportional to the needs of the Netflix Litigation. FIG further objects
 25 to this Topic to the extent it seeks information protected by the attorney-client
 26 privilege, the attorney work-product immunity doctrine, the common interest
 27 privilege, and any other applicable privilege or protection. FIG also objects to this
 28 Topic to the extent it seeks third-party information that FIG is obligated to keep

1 confidential.

2 On all of these grounds, FIG objects to producing, and will not produce, any
3 witnesses to testify regarding this Topic.

4
5 Respectfully submitted,

6 Dated: July 1, 2020

7 /s/ Jeremiah A. Armstrong
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9 Jeremiah A. Armstrong

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12 Attorneys for Third Party
13 Fortress Investment Group, LLC
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CERTIFICATE OF SERVICE

I, Jeremiah A. Armstrong, declare: I am a citizen of the United States and employed in Burlingame, California. I am over the age of eighteen years old and not a party to the within-entitled action. Today I served a copy of the foregoing document via email to the following:

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Dated: July 1, 2020

/s/ Jeremiah A. Armstrong
Jeremiah A. Armstrong